



## **Business Conduct Policy Statement**

Specialised Pipe and Fittings Australia (SPFA) is committed to operating our business ethically, responsibly, and with compassion to minimise any negative impact from our operations.

Business dealings will be undertaken in accordance with sustainable business practices, and in line with the Global Compact's 10 Principles, and the Universal Declaration of Human Rights.

SPFA makes the following commitments:

### **Respect for the Protection of Human Rights & Labour Standards**

SPFA expects our business partners to provide their employees with a safe and healthy place of work that complies with international standards & relevant local laws.

SPFA has a zero-tolerance policy for discrimination and requires that all employees in our operations be treated with respect, dignity and are dealt with based on individual merit, irrespective of race, colour, religion, gender, age, sexual orientation, marital status or disability. We ask all our business partners to commit to creating a fair work environment and to abide by all relevant laws in regard to hiring and employment practices.

SPFA will not use involuntary, bonded or forced labour or let anyone do so under our name. We will not deal with business partners who engage child labour in breach of the UNICEF and ILO guidelines.

SPFA acknowledges and expects its business partners to respect and uphold the freedom of association and the right of employees to collective bargain in accordance with relevant laws. We also expect our business partners to respect and uphold the freedom and the right of employees to not be part of collective bargaining, or any other representative body, in accordance with relevant laws.

### **Anti-Corruption, Integrity & Ethics**

SPFA expects its business partners to operate under the highest standards of business ethics, to respect local and international laws, and not to engage in any form of corruption including bribery, fraud, or extortion. SPFA employees are generally restricted from giving or receiving gifts that have a value over USD\$500 without prior management approval. SPFA deems that facilitation payments are a form of corruption and is committed to removing these payments from business dealings.

SPFA will not condone or allow any form of money laundering by our employees, business partners, or on our behalf.

SPFA does not believe in anti-competition agreements or conduct, and will not participate in fixing prices, restrictive supply, bid rigging, market sharing or any other form of collusive behaviour. We expect our business partners to operate under the same standards and abide by relevant laws and regulations.

SPFA holds its employees to account and expects them and their business partners to immediately identify, address and notify us if there is an actual, perceived, or potential conflict of interest.



Jeff Nicholas  
**Managing Director**

January 3, 2023