

# PROBE

*THE NEXT GENERATION*  
BPO

## Supplier Code of Conduct

### Corporate Policy

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## Corporate Governance

Probe is committed to implementing and maintaining standards of good governance where we undertake our business activities in an ethical and transparent manner consistent with applicable laws. This extends to the Suppliers with whom we do business.

Probe procures a diverse range of goods and services and consistent with our Procurement Policy we are committed to strong governance of procurement activities to ensure our supply chain is cost effective, innovative, risk managed, sustainable, responsible, fair and ethical. This includes actively managing environmental, safety, social and governance risks and opportunities in our supply chain.

This Supplier Code of Conduct details the standards expected of our Suppliers and their supply chains, when providing goods and services to or on behalf of the Probe and applies to any third party providing products or services to or on behalf of Probe.

Suppliers are required to communicate this Code to related entities, suppliers and subcontractors who support them in supplying goods and services to Probe so that they are aware of, understand and comply with this Code of Conduct.

## Ethics and Business Conduct

It is the expectation that all Suppliers act honestly, fairly and without prejudice in all business dealings, avoiding conflicts of interest and acting with integrity.

Probe has various workplace policies in place to prevent dishonest or unethical conduct and fostering a culture of honesty and accountability. This is also reflected in this Supplier Code of Conduct. We require all Suppliers to act in a manner consistent with our XTRA philosophy including with xtra value, xtra performance and xtra integrity.

### Bribery and Corruption

Probe is committed to compliance in all respects with relevant laws in the jurisdictions within which we choose to operate and we have a zero tolerance policy to any form of Bribery or corruption. All Suppliers must comply with applicable anti-bribery and anti-corruption laws and must have adequate policies and procedures in place to monitor compliance with such laws and ensure its employees, contractors and sub-contractors are aware of its anti-bribery policy and how to comply with its requirements. Suppliers must not tolerate or enter into any bribery, including improper offers or payments to or from employees, customers, suppliers, organisations or individuals.

Bribery is a serious criminal offence under Australian Commonwealth and State Law and is prohibited under the Foreign Corrupt Practices Act 1977 (US) and the Bribery Act 2010 (UK). It is irrelevant if the bribe is accepted or ultimately paid. Penalties for non-compliance with anti-bribery laws are serious and can include substantial fines for both the company and individuals involved. All Suppliers are responsible for helping prevent and report any instances of Bribery or suspicious activities. Anonymous reports may be made via Probe's Whistleblower Policy which is available on our website [www.probegroup.com.au](http://www.probegroup.com.au).

Probe may report any Bribery to relevant authorities, including law enforcement agencies.

## Compliance with laws/money laundering

Probe strictly complies with all relevant legislation and rules and ensures ethical corporate behaviour. Suppliers must comply with the laws in the countries where they operate.

Suppliers must

- act in accordance with all applicable international standards and laws on fraud and money laundering;
- not do or omit to do anything likely to cause any party to be in breach of any of such international standards and laws;
- maintain an effective anti-fraud and (where appropriate) an anti-money laundering compliance programme, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.

## Environment and Sustainability

Probe recognises a shared responsibility to protect the planet. We recognise that although our operations have a small ecological footprint, we endeavour to reduce the environmental impact of our business operations by amongst other things, a commitment to sourcing sustainable environmental solutions and engaging suppliers who look to conduct their business operations in a way that protects and sustains the environment.

We value Suppliers whose practices demonstrate commitment to sustainable development principles. Our suppliers should be committed to environmental standards and responsible, productive community relationships. Consistent with our Procurement Policy we value Suppliers whose business relationships will have a positive and enduring effect on the communities in which we operate.

All Suppliers are required to:

- Comply with relevant local and national laws relating to environmental impact, climate change and greenhouse gas emissions.
- Obtain, maintain and keep current all necessary environmental permits where relevant to the goods or services provided to Probe (e.g. waste management, transportation), approvals and registrations.
- Proactively seek to minimise any negative impact of their operations on the environment including implementing an environmental management plan.
- Identify, minimise, monitor, control and treat all hazardous air pollutants and all emissions should be avoided in accordance with international standards and applicable laws.
- Cooperate with Probe on measurement and reporting of greenhouse gas emissions in the supply chain.

## Workforce Rights and Responsibilities

We have a NEXT GEN BPO culture which places a strong focus on respectful and ethical conduct. Probe are committed to creating a work environment based on fairness, honesty, trust, support and to live by the 'i pass on' spirit.

### Child and Forced Labour

Suppliers must only employ people above the legal working age and strictly prohibit child labour. Probe does not engage with any Supplier, organisation body or institution that uses, either directly or indirectly, child labour or forced labour. Suppliers must not use any form of forced, bonded, compulsory labour, slavery or human trafficking.

Supplier's employees must be entitled to leave work or terminate their employment with reasonable notice. Suppliers must not require their employees to lodge deposits of money or withhold payment or place debt upon employees or require employees to surrender any government-issued identification, passports, or work permits as a condition of employment with the Supplier.

### Modern Slavery

Suppliers whether directly or through their supply chain, must comply with all applicable modern slavery laws, including not engaging in human trafficking, slavery, servitude, forced labour, debt bondage and child labour as noted above. Human rights abuses are not permitted in any form in our supply chain. Suppliers must have adequate processes in place to ensure that their supply chain comply with applicable laws relating to minimum wages, child labour and modern slavery including complying with any associated mandatory reporting requirements.

### Fair and Reasonable Working Conditions

Probe is committed to ensuring its people work under conditions that comply with all national, local and international labour standards and laws and codes of the countries in which it operates including, but not limited to, the ETI Base Code. Suppliers must comply with all relevant local and national laws and regulations in relation to employment practices, modern slavery, human rights, discrimination, harassment and bullying. Suppliers are also required to ensure they provide fair working conditions for their employees, including acceptable maximum working hours, fair and reasonable pay, adequate rest periods and sufficient leave in accordance with applicable laws.

### Freedom of Association

Suppliers are expected to respect freedom of association and rights of employees under relevant industrial instruments.

## Diversity

Probe values and seeks to achieve diversity in its supply chain, in ways that increase its awareness, content knowledge, cognitive sophistication, and empathic understanding of the complex ways individuals interact within systems and institutions. Suppliers are required to promote diversity, inclusion and equity in the workplace where race, religion, age, sexual orientation, gender, pregnancy, maternity, and/or disability are no impediment to recruitment and/or ongoing employment.

Probe will proactively identify opportunities in our supply chain to meet commitments under our Diversity Policy and Indigenous Procurement Policy. We encourage opportunity for a diverse range of Suppliers which may include but is not limited to majority Indigenous owned businesses and those who employ Indigenous people.

## Health and Safety

Probe takes workplace safety seriously and is committed to protecting workers and other persons on Probe sites against harm to their health, safety and welfare through the elimination, isolation or minimisation of hazards arising from work where it is reasonably practicable to do so.

Suppliers are expected to:

- Be compliant with all relevant national and local safety legislation, including but not limited to workplace and occupational health and safety, health and safety management and reporting.
- Provide a healthy and safe working environment for employees, contractors, partners or others who may be affected by Supplier's activities, in accordance with international standards and national laws.
- Have a written health and safety policy or equivalent document, and ensure that employees are trained to comply with that policy.
- Have mechanisms and shall implement them to ensure that all its employees are competent to carry out the health and safety aspects of their responsibilities and duties. This shall include the nomination and training of persons at an appropriate level (and in particular executives), who are responsible for discharging Supplier's health and safety obligations.
- Ensure facilities and amenities, including employee accommodation where provided by Supplier, shall be hygienic, safe and meet the basic needs of employees.
- Have a system to record, monitor and manage health and safety risks and incidents, that is aligned to the organisation's risk profile as well as applicable laws and standards.
- Comply with all Probe site-specific safety requirements where the nature of the goods or services provided by the Supplier necessitates the need to attend Probe premises.
- Immediately report any incidents that occur on Probe premises in the provision of the goods or services.
- On request from Probe suppliers must be able to provide and demonstrate evidence of WHS training provided for their employees. Suppliers must be able to demonstrate their employees and subcontractors have and maintain relevant licences such as white cards (or equivalent), mobile plant tickets, high risk work licences, specialist Registered Training Organisation (RTO) certificates as appropriate to the nature of the goods and services provided to Probe.

## Trade Control Laws

Suppliers must comply with:

- All Trade Control Laws and Sanctions;
- Not do anything which may cause Probe to breach Trade Control Laws or Sanctions;

Suppliers must not be named in the Consolidated List maintained by the Department of Foreign Affairs and Trade (DFAT).

Suppliers must keep Probe apprised of such information that Probe may reasonably require to ensure compliance with Trade Control Laws and Sanctions including, but not limited to, any proceedings against the Supplier in relation to compliance with Trade Control Laws and the potential imposition of any Sanctions against the Supplier or the geographical location within which the Supplier operates.

For the purposes of this Code of Conduct Trade Control Laws means all applicable import and export trade control laws including, but not limited to, the Charter of the United Nations Act 1945 (the United Nations Act), the Autonomous Sanctions Act 2011 (the Autonomous Act) and the Australian Autonomous Sanctions Regulations 2011.

Sanctions means any financial, economic or trade sanction laws, embargoes or restrictive measures of any relevant regulatory authority in the locations in which Probe operates.

## Environment and Sustainability

Suppliers must comply with all applicable environmental laws, including, but not limited to, environmental management, protection and reporting obligations. Suppliers are expected to actively identify, manage and minimise material environmental risks or harm associated with their operations and the services provided to Probe.

## Review

Probe may conduct regular assessments of the practices of its Suppliers to ensure alignment with this Code of Conduct and policies referenced within this document. This may incorporate screening, self-assessments, direct engagement with Suppliers, reasonable requests for supporting documents and data and ongoing management and mitigation of material risks. This process is intended to assist with identifying best practices and support a sustainable and responsible supply chain.

Suppliers are expected to:

- Disclose breaches of the Code of Conduct to Probe as soon as reasonably practicable.
- Respond to reasonable requests by Probe for review and or documentation in a timely manner.
- Provide transparent, correct and complete information.

Suppliers are required to provide Probe with information reasonably required to enable Probe to comply with relevant mandatory reporting obligations under applicable laws including, but not limited to, modern slavery and anti-bribery laws.

## Breach Reporting

Suppliers are expected to identify, correct and monitor the continued compliance of any activities that fall below the standards of this Code of Conduct.

Suppliers must promptly report to Probe any serious breaches of this Code of Conduct and together with Probe agree a schedule for corrective action.

Probe is committed to fostering a culture of honest and ethical behaviour. Probe recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident about reporting wrongdoing and are supported and protected throughout the process.

Suppliers, their employees and subcontractors can raise concerns with:

- Their Probe relationship points of contact,
- Via email to [mike.nekrasov@probegroup.com.au](mailto:mike.nekrasov@probegroup.com.au); or

In the event that an employee or contractor does not feel comfortable doing this, a disclosure may be made to an independent third party via Probe's External Whistleblower Reporting Service.

Suppliers can obtain a copy of Probe's Whistleblower Policy at [www.probegroup.com.au](http://www.probegroup.com.au).

## References

Whistleblower Policy



## Document Information

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## Change history

Version	Date	Change	Author	Reviewer(s)*
1.0	12-Jul-19	First Probe version	Jo Zaharopoulos	Mike Nekrasov
2.0	23-Mar-20	Updated to include Environment and Sustainability and expand Modern Slavery	Jo Zaharopoulos	Di Reid

## Release authorisation

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<b>Release Name</b>	Mike Nekrasov

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