



SUPPLIER CODE OF CONDUCT



RTO 32519

VALUES THAT GUIDE US

Our values are the essence of our company's identity. They represent how we act, speak and behave together, and how we engage with our clients and stakeholders.

SAFETY	We put safety at the heart of everything we do, to safeguard people, assets and the environment.
INTEGRITY	We do the right thing, no matter what, and are accountable for our actions.
COLLABORATION	We work together and embrace each other's unique contribution to deliver amazing results for all.
INNOVATION	We redefine training by thinking boldly, proudly and differently.

MESSAGE FROM THE CEO

At Australian Skills Group, acting with integrity means making the right choices and holding ourselves to the highest standard of ethical behaviour. Maintaining a reputation of integrity depends on the actions of everyone in the organisation, as well as those of third parties we collaborate with.

For that reason, we expect our suppliers, subcontractors and representatives, as well as anyone working for them or acting on their behalf (including their employees, consultants, suppliers and representatives) to adhere to and share the principles expressed in this Supplier Code of Conduct.

This document sets the standards of how to work for, or act on behalf of, Australian Skills Group and summarises our governing principles. We expect you to never compromise on integrity, always comply with this Supplier Code of Conduct and with all applicable laws and regulations, and refrain from any actions (or inaction) that would jeopardise you or Australian Skills Group's integrity.

You are our key partners and your commitment is paramount to our shared success. Thank you for being engaged in our values and in fostering a culture of integrity.

Paul Scaysbrook

Chief Executive Officer

TABLE OF CONTENTS

VALUES THAT GUIDE US	1
MESSAGE FROM THE CEO	1
TABLE OF CONTENTS	2
1. A Culture of High Ethical Standards	3
2. Avoiding Conflicts of Interest.....	3
3. Adopting Appropriate Business Practices	4
3.1 Consumer Law Legislation	4
3.2 Anti-Bribery	4
3.2.1 Facilitation Payments	4
3.2.2 Gifts and Hospitality	5
3.3 Accounting Practices and Record Keeping	5
4. Corporate Responsibility	5
4.2 Mutual Respect	6
4.3 Health, Safety and Environment	6
5. Confidential Information and Privacy	6
6. Reporting Suspected Misconduct and Concerns	7

1. A Culture of High Ethical Standards

Australian Skills Group promotes integrity and the highest ethical standards in all aspects of its business. At Australian Skills Group, we want to work with third parties who share our values and culture of integrity.

Australian Skills Group's suppliers, subcontractors and representatives, as well as anyone working for them or acting on their behalf (including their employees, consultants, suppliers and representatives) must adhere to and share the principles expressed in this Supplier Code of Conduct. For the purpose of this document, the term "supplier" includes them all.

This means that all suppliers must enforce obligations as strict as those set out in this Supplier Code of Conduct upon their own suppliers whenever they are involved in Australian Skills Group business or related activities.

It also means that all suppliers must provide their employees with enough information and training to make sure that they understand and comply with the obligations set out in this Supplier Code of Conduct.

Suppliers must confirm, in writing, that they will comply with the principles set out in this Supplier Code of Conduct.

We can all contribute to maintaining our high ethical standards by speaking up whenever we encounter a situation that might raise questions about integrity or misconduct. We ask that our suppliers do the same. The reporting process is described in the last section of this Supplier Code of Conduct.

2. Avoiding Conflicts of Interest

When working for, or on behalf of, **Australian skills Group, suppliers** must always:

- Act in the best interest of Australian Skills Group;
- Completely and truthfully disclose, in writing, any actual, potential or perceived conflicts of interest to Australian Skills Group before entering into negotiations and/or starting a business relationship with Australian Skills Group;
- Promptly disclose, in writing, any conflicts of interest arising during their business relationship with Australian Skills Group to their Australian Skills Group; and
- Avoid any conflicts of interest, whether actual, potential, or perceived, that are not properly disclosed and mitigated.

3. Adopting Appropriate Business Practices

Suppliers must conduct their business in compliance with all applicable Australian laws and regulations, including, but not limited to, those relating to corruption, bribery, competition, modern slavery, and health, safety and environment.

Suppliers must never:

- Carry out any conduct or activity that would expose Australian Skills Group to a risk of penalties under any laws and regulations: or
- Make any act or omission that will cause or lead Australian Skills Group to breach any applicable laws or regulations.

3.1 Consumer Law Legislation

Antitrust and competition laws are generally designed to uphold free and open competition in the marketplace.

Suppliers must always:

- Engage in fair and honest competitive business practices; and
- Comply with antitrust and competition legislation.

Suppliers must never discuss, collude or agree to:

- Fix or control prices, terms or conditions;
- Restrict competition or dealings; and
- Share confidential information with current or potential competitors, or any other relevant party, including clients.

3.2 Anti-Bribery

Suppliers must never:

- Accept request, offer, promise, give or authorise a bribe, kickback, payment or anything that can be considered as such (gifts, entertainment, employment, contracts or benefits of any kind) with the intent to obtain an improper or unfair advantage, retain business or influence a third party's actions.

3.2.1 Facilitation Payments

Suppliers must never:

- Make any facilitation payments on behalf of Australian Skills Group or for the intended benefit of Australian Skills Group, whether they are working directly or indirectly with Australian Skills Group.

3.2.2 Gifts and Hospitality

Suppliers must always comply with the following principles when offering, accepting or exchanging gifts, hospitality or entertainment on behalf of, or for the intended benefit of Australian Skills Group.

Suppliers must always:

- Make sure that benefits comply with all applicable laws and regulations;
- Make sure that benefits comply with this Supplier Code of Conduct; and
- Obtain prior authorisation, in writing from Australian Skills Group;

Suppliers must never:

- Request benefits from anyone;
- Exchange benefits when it raises questions about conflicts of interest; or
- Offer, accept or exchange cash or cash equivalents on behalf of Australian Skills Group.

3.3 Accounting Practices and Record Keeping

Suppliers must always:

- Maintain complete and accurate books, records and documents, in accordance with accepted financial accounting principles.

4. Corporate Responsibility

Modern Slavery Act (2018)

Australian Skills Group has a zero-tolerance approach to all forms of Modern Slavery such as forced labour, debt bondage, child labour and human trafficking within its supply chain. As an Education business, Australian Skills Group recognises, and is committed to its role to raise awareness of Modern Slavery risks, encourage and influence action, and build competencies amongst participants in the Education supply chain. In order to be effective to this commitment, Australian Skills Group will actively analyse and identify Modern Slavery risks in its supply chain, work with clients to reduce Modern Slavery risks in materials selection, analyse and understand suppliers' level of scrutiny of their Modern Slavery risks, and work with suppliers towards outcomes that eliminate Modern Slavery in the education supply chain.

Australian Skills Group recognises that an industry-wide approach to tackle Modern Slavery will be most effective and will continue to work with industry bodies in support of a 'common industry framework'.

4.2 Mutual Respect

At Australian Skills Group, the preservation of everyone's dignity, privacy and rights is a priority.

Suppliers must always:

- Maintain a work environment free of discrimination, harassment or violence;
- Ensure that diversity and inclusivity in the workplace are supported and encouraged;
- Take measures to eliminate discrimination and promote equality; and
- If requested, collaborate with Australian Skills Group and/or industry to deliver improvements in equality, diversity and inclusion.

4.3 Health, Safety and Environment

At Australian Skills Group, we are committed to doing business in a safe, ethically, environmentally and socially responsible manner.

Suppliers must always:

- Make sure that compliance with the applicable workplace health, safety and environment laws and regulations is treated as the minimum standard everywhere they conduct business;
- Protect anyone who takes part in their operations (including Australian Skills Group personnel) and/or comes into contact with their work sites and offices;
- Focus on hazard recognition, risk assessment and elimination of hazards; Seek to establish an incident-free work environment; and
- Carry out their operations with care for the environment.

5. Confidential Information and Privacy

Suppliers must always:

- Protect confidential information belonging to Australian Skills Group, its clients, and its business partners from inappropriate or unauthorised access;
- Obtain written consent before using or accessing any such confidential information; limit access to confidential information to those who require it to carry out their duties;
- Protect personal and private information in accordance with applicable data protection and privacy laws; and
- Have appropriate policies and procedures in place to ensure that information is kept protected, secure and confidential.

6. Reporting Suspected Misconduct and Concerns

At Australian Skills Group, we believe that everyone can contribute to maintaining our high ethical standards by speaking up whenever they encounter a situation that might raise questions about integrity or misconduct. This is why suppliers must immediately report to Australian Skills Group any evidence or suspicion that anyone engaged in Australian Skills Group business (including, but not restricted to, Australian Skills Group employees and the supplier's employees):

- Has breached the Australian Skills Group Code of Conduct;
- Has breached this Supplier Code of Conduct;
- Has failed to comply with any applicable laws, rules or regulations; or
- Has committed any other instances of misconduct or pressure to compromise our ethical standards.

All suppliers must fully cooperate with Australian Skills Group when it investigates any report received and shall ensure cooperation from their own suppliers whenever they are involved in Australian Skills Group business. This includes, for example, providing timely access to relevant records and making personnel available for interviews.

Australian Skills Group is committed to creating an environment where everyone feels comfortable to report any of the situations as described above. Australian Skills Group prohibits retaliation against anyone who, in good faith, comes forward with their concerns.