



**VULCAN ENERGY**  
**ZERO CARBON LITHIUM™**

## **SUSTAINABLE SUPPLIER POLICY**

This Policy was approved by the Board of Vulcan Energy Resources Limited on  
2 September 2021

## **1. Introduction**

Vulcan Energy Resources Ltd (**Vulcan**) is committed to ensuring its supplier practices meet the highest standards of business ethics and integrity, are transparent and fair. Vulcan procures a wide range of products and services (including the suppliers of office products) and recognises that its supplier responsibilities extend beyond its direct suppliers.

This policy outlines Vulcan's expectation of its suppliers, and their supply chain, in regard to governance, ethics and sustainability matters. Compliance with this standard will be taken into consideration during the contract award process and performance assessments during the term of a contract.

## **2. Sustainability**

Sustainability is at the core of Vulcan's values and is predicated on Vulcan's commitment to behave ethically, to create value for its stakeholders, and to have a positive input in the communities and environments in which Vulcan operates.

Vulcan will consider setting sustainability objectives and targets for its operations and suppliers may be given specific KPIs under their contracts to demonstrate how their performance is aligned with Vulcan's objectives and targets.

## **3. Corporate Governance and Ethics**

Good governance is critical to business and Vulcan seeks to adopt leading practices, in contemporary governance standards and apply these in a manner consistent with its culture and values. Vulcan expects its suppliers to uphold the highest ethical business practices as outlined in its Corporate Code of Conduct. Compliance with the Code is a condition of working for Vulcan.

All suppliers are expected to manage risk, governance, and compliance adequately and ensure their employees understand the requirements of this policy. Suppliers should have a grievance process available to employees and their suppliers and a policy that provides protection for whistleblowers.

## **4. Local Laws**

Suppliers must comply with all relevant laws and regulations.

## **5. Anti-Bribery and Corruption**

Bribery and corruption undermines legitimate business activities, distorts competition and exposes Vulcan and its people to significant risks. Vulcan has a zero-tolerance approach to bribery and corruption, whether direct or indirect, in the private or public sector, anywhere in the world.

Suppliers must comply with Vulcan's Anti-Bribery and Anti-Corruption Policy and have and maintain its own policies and procedures to ensure compliance with the appropriate legislation in their jurisdiction.

## **6. Sanctions Compliance**

Vulcan is committed to complying with the relevant economic and trade sanctions laws (Sanctions) of all jurisdictions in which it operates or intends to operate. Suppliers must not engage in any activities that could lead to Vulcan breaching applicable Sanctions obligations.

Suppliers, their personnel and related companies must always comply with the Sanctions imposed, enacted, administered or enforced by the United States of America, the United Nations, the European Union, the United Kingdom and Australia.

## **7. Health and Safety**

All suppliers are expected to have a health and safety policy (or equivalent) and ensure that their employees understand the requirements of the policy. Suppliers should also have a system, to record, monitor and manage health and safety risks and incidents. Suppliers must comply with all Vulcan's health and safety policies, standards and procedures.

## **8. Safeguarding the Environment**

Vulcan is committed to safeguarding the environment. Suppliers are expected to minimise the environmental impact of their activities and comply with Vulcan's environmental standards, management plans and procedures. For more information refer to Audit, Risk and ESG Policy.

All suppliers are expected to have an environmental policy (or equivalent) and ensure that their employees understand the requirements of the policy. Suppliers should also have a system to measure, manage, minimise, and report the environmental impact of their activities.

Vulcan is committed to contributing to global efforts to combat climate change and expects its suppliers to be undertaking actions to evaluate the risks and opportunities of climate change to their business and work towards reducing their greenhouse gas emissions in line with the objectives of the Paris Agreement

## **9. Human Rights and Labour Conditions**

Vulcan is committed to upholding and respecting the human rights of all people including its employees, the communities in which it operates, those who may be impacted by its activities and those within its supply chains. Vulcan respects freedom of association, the right to a fair wage and ensures all employees are treated fairly and without discrimination including against age, race, gender, political or religious belief, culture, family commitments, physical or mental ability, marital status, or sexual orientation.

Suppliers are expected to conduct business in a manner consistent with the human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business.

Suppliers are expected to ensure all people are treated with dignity, courtesy, and respect, irrespective of age, gender, race, sexual orientation, political or religious belief, culture, marital status, family commitments, physical or mental ability. Suppliers are also expected to ensure fair working conditions and wages including equal pay for equal work.

### **9.1. Modern Slavery**

Vulcan rejects and prohibits the use of all forms of slavery, child or forced labour within its operations and the operations of its suppliers. Suppliers are expected to comply with the requirements of the Modern Slavery Act 2018 (Cth) including having the necessary processes and procedures in place to investigate, assess and address the risk of modern slavery within their operations, and those of their supply chain including implementing appropriate due diligence and remediation programs.

## **10. Local Suppliers**

Vulcan strives to create economic opportunities within the regions it operates by employing local people and purchasing local products and services.

## **11. Reporting Misconduct**

Any suspected breaches of Vulcan's Corporate Code of Conduct and relevant policies, procedures and standards including instances of corruption, bribery and human rights abuses should be reported via the details in its Whistleblower Policy, available to employees, suppliers, and the community.

## **12. Management Commitment**

We expect suppliers who work with Vulcan to share our commitment to the principles raised in this Policy by adopting and promoting the commitments contained within and encouraging their subcontractors to do the same.

## **13. More information**

For more information, please visit [www.v-er.eu](http://www.v-er.eu).