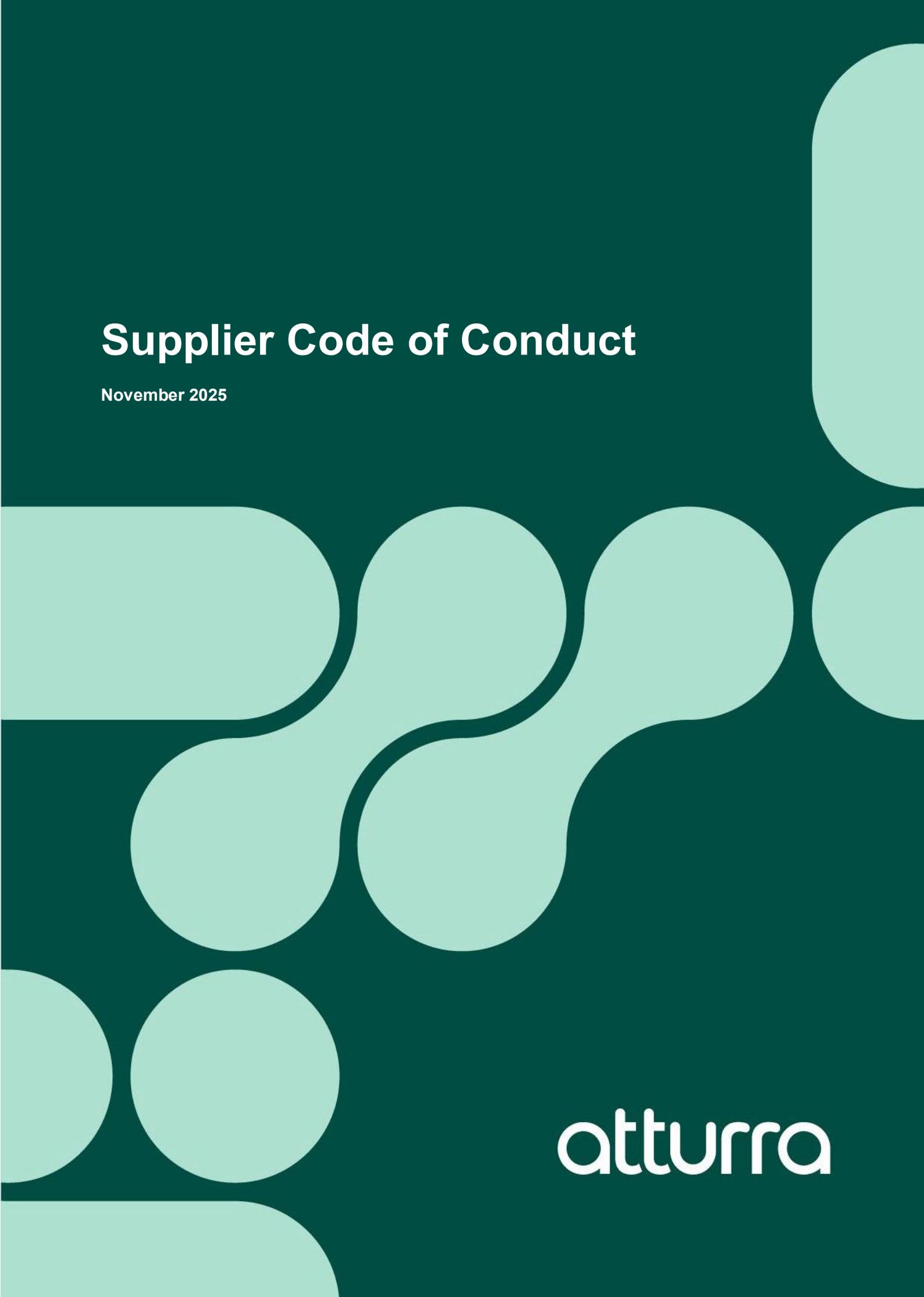


Supplier Code of Conduct

November 2025



atturra

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1. Introduction

This Supplier Code of Conduct (**Code**) sets out the minimum standards that Atturra Limited ACN 654 662 638 and each of its related bodies corporate (**Atturra**) expect all businesses involved in the supply of goods or services to Atturra (**Suppliers**) to meet at all times. Suppliers must also ensure that their employees, contractors, and supply chain participants comply with the Code at all times when dealing with Atturra.

Suppliers must continually monitor their compliance with the Code and notify Atturra if they become aware of any breaches of the Code. In addition to the Code, Suppliers must comply with all applicable laws, regulations and Australian standards, as well as the relevant national laws and regulations of the jurisdictions in which they operate.

This Code may be varied, amended, withdrawn or replaced at any time at the sole discretion of Atturra. A copy of this Code is available to Suppliers on the Atturra website at <https://investors.atturra.com/governance/>.

2. Anti-bribery and corruption

Suppliers must:

- (a) maintain and ensure compliance with adequate policies and procedures relating to all laws, rules and regulations relating to anti-bribery, anti-corruption and anti-money laundering, including the *Criminal Code Act 1995* (Cth), the *Foreign Corrupt Practices Act* of the United States of America, and the *Bribery Act 2010* of the United Kingdom;
- (b) discourage and prohibit bribery and related improper conduct, identify and respond to instances of bribery, and promote compliance with all applicable laws and regulations;
- (c) comply with all applicable competition laws, including those related to teaming and information sharing;
- (d) comply with all applicable international trade controls including export controls, economic sanctions and anti-boycott laws;
- (e) comply with anti-money laundering and counter terrorist financing laws and not engage with or assist any third parties in connection with these crimes; and
- (f) conduct all business dealings with integrity and honesty.

3. Human Rights

Suppliers must adopt a zero-tolerance approach to breaches of fundamental human rights and ensure that:

- (a) employees are paid in a timely manner in accordance with minimum wages prescribed by legislation, industrial award or enterprise bargaining agreement (as applicable);
- (b) employees do not work more than the maximum working hours prescribed by legislation, applicable award or enterprise bargaining agreement (as applicable);
- (c) no forced, compulsory or involuntary labour, slavery or trafficked workers are used within the Supplier's business or supply chain, whether directly or indirectly. This includes the transportation, recruitment, and transferring of persons by means of threat, force, coercion, or fraud;
- (d) Atturra is notified immediately regarding any instances or potential instances of Modern Slavery and provide Atturra with reasonable assistance to enable Atturra to comply with its obligations under the *Modern Slavery Act 2018* (Cth);
- (e) no children under the legal minimum age are employed or contracted by the Supplier;
- (f) no discriminatory practices are used or supported in the management, hiring, promotion or termination of employees including on the grounds of age, race, religion, sexual orientation, gender, gender identity, pregnancy, marital or domestic status, disability, political affiliation, industrial activity or union membership; and
- (g) no abuse or intimidation in any form whether physical, sexual, verbal, or psychological is used in the workplace.

4. Health and safety

Suppliers must demonstrate an ongoing commitment to the health, safety and wellbeing of its employees and must:

- (a) Ensure, so far as is reasonably practicable, provide and maintain a working environment that is safe and without risks to health;
- (b) have appropriate policies, processes and systems in place to respond to incidents in the workplace; and
- (c) provide training to all employees on occupational health and safety considerations relating to the work they are undertaking.
- (d) Notify Atturra if it becomes aware of a notifiable incident at a workplace and provide whatsoever information and assistance required by Atturra to notify and resolve any such workplace incident.

5. Environment

Suppliers must endeavour to minimise negative environmental impacts as a result of their operations. To that effect, Suppliers should:

- (a) have adequate environmental management processes or policies in place; and
- (b) comply with all applicable environmental laws, regulations and standards.

6. Protecting Information

Suppliers must respect intellectual property rights, protect confidential information, comply with data and security standards, policies, and controls, and comply with privacy rules and regulations. To that effect, Suppliers should:

- (a) protect and responsibly use the physical and intellectual assets of Atturra, including intellectual property, tangible property, supplies, consumables, and equipment, when authorised by Atturra to do so;
- (b) work with Atturra to understand and comply with security standards, policies, and controls;
- (c) disclose and ensure any identified vulnerabilities are address immediately;
- (d) not provide access to Atturra information, or customer information, without a legitimate business need, and permission from the responsible owner;
- (e) recognise that any use, sharing or retention of personal data must be supported by, or based on consent or a legitimate compelling business purpose and strictly in accordance with agreed terms and conditions with Atturra; and
- (f) follow all local privacy and protection laws.

7. Failure to comply with the Code

- (a) Suppliers must maintain accurate, transparent records of business operations, permits and licences.
- (b) Atturra may, at any time, verify a Supplier's compliance with this Code by requesting the provision of records, supporting documentation and evidence. Suppliers must cooperate with such requests and provide Atturra with all materials reasonably required to review and verify their compliance with the Code.
- (c) If a Supplier is unable to comply with this Code, they must provide Atturra with detailed information on their non-compliance and indicate whether they plan to comply in the future, and if so, when.
- (d) The Supplier must furnish relevant information to Atturra relating to the issues outlined in this Code upon request.
- (e) A failure by a Supplier to comply with the Code may result in Atturra considering termination of an agreement, contract or arrangement with such Supplier.

- (f) The Supplier must use their best endeavours to ensure that where relevant its subcontractors also adhere to the applicable terms of this Code.

- (g) To report questionable behaviour or a possible violation of the Code, Suppliers are encouraged to work with their primary Atturra contact in resolving your concern. If that is not possible or appropriate, please contact the appropriate Officers via:

Officers

Chief Executive Officer Stephen Kowal Stephen.Kowal@atturra.com	General Counsel Helen Ord Helen.Ord@atturra.com
Chief Finance Officer Herb To Herb.To@atturra.com	

8. Review

This Code will be reviewed periodically by Atturra to ensure that it is operating effectively, having regard to the changing circumstances of Atturra. Any updates to this Code must be complied with by Atturra's suppliers.