

COX AUTOMOTIVE AUSTRALIA AND NEW ZEALAND SUPPLIER CODE OF CONDUCT

Application and Purpose

Cox Automotive is a global automotive organisation dedicated to transforming the way the world buys, sells and owns cars. The Cox Automotive family includes Dealer-Auction, Dealer Solutions, Kelley Blue Book, Manheim, SellMyCar, DealerCell and Xtime.

Cox Automotive is committed to ensuring ethical, sustainable and socially responsible procurement across its business. This Supplier Code of Conduct (**Code**) applies to all Suppliers (including employees, contractors, agents and related entities) who supply products or services to the Cox Automotive Australia and New Zealand group (**Cox ANZ**). The Code details the minimum standards which Suppliers are required to meet. It is the responsibility of the Supplier to ensure that their personnel and subcontractors adhere to this Code.

Business Integrity and Ethics

Suppliers are expected to be ethical in their business practices and dealings and must comply with applicable laws relating to anti-bribery, anti-corruption, anti-money laundering and modern slavery laws. Suppliers must not engage in, either directly or indirectly, activity which is, or has the potential to be, fraudulent, unethical or exploitative.

Corporate Governance

Suppliers must develop and maintain internal policies and processes to identify, manage and control risks associated with the Supplier's business operations. It is expected that Suppliers conduct regular assessments of their facilities and operations (and those of their agents and subcontractors) and to cooperate with any audit or assessment required by Cox ANZ.

Confidential Information

Suppliers must not disclose or improperly use confidential or commercially sensitive information in the course of its dealings with Cox ANZ.

Conflict of interest

A Supplier must disclose to the relevant Cox Automotive AU contract/account manager any relationship, activity or interest that may constitute or create an actual, potential or perceived conflict of interest related to or in connection with its dealings with Cox ANZ.

Gifts

Suppliers must not offer Cox ANZ personnel gifts or benefits which are intended to obtain any unfair or improper advantage. Gifts and benefits are anything of value, including payments, discounts, loans, good, services, shares, vouchers or other items which intended to give the Supplier an unfair advantage.

Labour and Human rights

Suppliers are expected to provide a fair and ethical workplace which upholds high standards of human rights, including without limitation:

No forced labour- Suppliers must ensure that all work is undertaken without coercion and must only employ workers who are the applicable minimum legal age.

Hours of Work- Suppliers must comply with applicable laws, regulations and industry standards with respect to wages, working hours and workers compensation insurance.

Wages- Suppliers must ensure that wages and employee benefits meet legal or industry minimum standards. All workers should be provided with written information about employment terms before they commence employment.

Freedom of association- Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

Discrimination- There must be equality of opportunity in hiring, compensation and treatment regardless of age, race, colour, gender identity, religion, political affiliation, union membership, ethnicity, social origin, sexual orientation, disability, marital status, or other distinguishing characteristics.

Human Rights- Suppliers are expected to have in place systems and controls to ensure that modern slavery and human trafficking are not taking place in their business operations and supply chains and where required by law, report on the risks of modern slavery practices.

See Cox Australia's Modern Slavery Policy [here](#)

Health and Safety

Suppliers must provide a safe working environment and best occupational health and safety practice shall be promoted at all times. Occupational health and safety hazards must be managed and information and training must be available to all personnel.

Environmental

All Suppliers must work to minimise any negative impact on the environment and must maintain environmentally responsible practices and policies. All applicable national and international environmental legislation must be adhered to.

Implementation

It is expected that Suppliers conduct regular assessments of their facilities and operations (and those of their agents and subcontractors) and to cooperate with any audit or assessment required by Cox ANZ. Action must be taken to remedy any deficiencies or breaches identified.

Any concerns regarding the implementation of the this should be raised directly with the relevant Cox ANZ contract/account manager.