

SUPPLIERS ETHICS AND COMPLIANCE STANDARDS

IT IS CRITICAL THAT ALL ALAT SUPPLIERS SHARE OUR COMMITMENT TO BUSINESS WITH INTEGRITY.

These standards apply to individuals/organizations that provide services, raw material, components, finished goods, or other products (“Suppliers”) to Aim Lab Automation Technologies Pty Ltd (“ALAT”). Where they exist, the Supplier’s own written ethics and compliance standards may replace these Standards if they are consistent with these standards and are incorporated into a written agreement between ALAT and the Supplier.

ADHERANCE TO APPLICABLE LAWS & REGULATIONS

- Suppliers must comply with the applicable laws, rules, regulations, and ethical standards of the country in which they operate, as well as these Standards.

PROHIBITION OF BRIBES, KICKBACKS, UNLAWFUL PAYMENTS, AND OTHER CORRUPT PRACTICES

- Suppliers are prohibited from directly or indirectly paying anything of value to a government official in order to:
 - Win or retain business or to improperly influence the act or decision of any government official, political party, candidate for political office, or official of a public international organization;
 - Gain an improper advantage; or
 - Illegally influence the action of any individual, customer, company, or company representative.
- Suppliers are required to keep accurate and transparent records that reflect actual transactions and payments.
- While ALAT observes local business customs and market practices, neither ALAT nor any Supplier shall participate in any corrupt, unethical or illegal practices.

ACCURACY OF BUSINESS RECORDS

- All financial books and records must conform to generally accepted accounting principles.
- Supplier records must be accurate in all material respects.
- Records must be legible, transparent, and reflect actual transactions and payments.
- Do not hide, fail to record, or make false entries.

FAIR COMPETITION AND ANTITRUST

- Suppliers must comply with all applicable laws and regulations regarding fair competition and antitrust.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- All Suppliers requiring the exchange of confidential information with ALAT are required to execute a confidentiality agreement with ALAT in advance.
- Exchange of confidential information is limited to that required to fulfil contracted performance requirements.
- Suppliers shall not share ALAT’s intellectual property or confidential information or any other information that they acquire with respect to ALAT’s business (including information developed by Suppliers and information relating to products, customers, suppliers, pricing, costs, know-how, strategies, programs, processes, and practices).

- Suppliers must immediately report unauthorized disclosure of ALAT’s confidential information, whether inadvertent or not.

DATA PRIVACY

- Supplier must abide by applicable data privacy laws and regulations when handling personal information.
- Suppliers must immediately report unauthorized use, disclosure, or loss of ALAT related personal information.

EMPLOYMENT PRACTICES GUIDELINES

- Suppliers must comply with all applicable Employment laws and regulation including statutes prohibiting discrimination in the workplace.
- Suppliers shall not possess, use or sell illegal drugs on ALAT property or perform their work under the influence of alcohol or illegal drugs.
- Suppliers will not produce or manufacture goods or services using forced, indentured or child labour. Regular full-time employees are to be at least 17 years of age. Suppliers must disclose the existence of part-time work, summer jobs, or apprenticeship programs for individuals under the age of 17 to ALAT’s management.
- ALAT does not permit intimidation or hostility and will not tolerate any behaviour from a supplier that might harass, disrupt or interfere with another person’s ability to work.
- Suppliers must treat ALAT employees with dignity and respect.

CONFLICTS OF INTEREST

- A conflict of interest arises when personal interests or activities influence, or appear to influence, the ability to act in the best interests of ALAT. Some situations that could cause a conflict of interest include:
 - Having a significant financial investment in any company that competes, does business, or seeks to do business with ALAT. A significant financial interest includes voting control, or an ownership of more than 1% of the outstanding capital of a business, or an investment that represents more than 5% of the investor’s total assets.
 - Providing similar services for direct competitors of ALAT, with access to confidential or competitive information.
 - When family members (or domestic partners, or those personally close to you) work for ALAT, another ALAT supplier, ALAT customer or ALAT competitor.

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- Suppliers must disclose any apparent or actual conflicts of interest to ALAT's management. If ALAT management approves an apparent or actual conflict, the approval decision must be documented.

TRADE COMPLIANCE

- Suppliers must comply with the letter and spirit of all applicable import and export controls, sanctions, and other trade compliance laws of Australia and the laws of the applicable country(ies) where the transaction(s) occur(s).

ENVIRONMENT, HEALTH & SAFETY

ALAT are committed to minimising our impact on the environment and ensuring that all personnel, contractors and visitors have a safe and healthy work environment.

- Suppliers are expected to comply with all applicable laws and regulations regarding environment, health and safety.
- Suppliers working with ALAT or onsite at an ALAT location must work in a way that assures their own safety and the safety of others and in compliance with applicable ALAT and governmental environmental, health and safety requirements and policies. Any emergencies that may impact ALAT must be reported promptly.

GIFTS & ENTERTAINMENT

Gifts and entertainment are not needed in order to conduct business with ALAT and are highly discouraged.

- The following situations are always inappropriate and are expressly prohibited:
 - Giving a gift, entertainment, or preferred treatment with the intention of trying to influence the decision making objectivity of an ALAT employee.
 - Offering any gift, entertainment, or preferred treatment while involved in a current purchasing or contracting decision process. (RFI, RFQ, RFP).
 - Any gift of currency including "gift cards".
- Offering entertainment where the Supplier will not be present/represented (e.g., sports/event tickets).
- Offering extravagant recreational outings, travel, or lodgings at supplier sponsored events.
- On a rare and infrequent basis ALAT employees may accept very modest gifts, entertainment, or other business courtesies if it helps improve the business relationship and they would be able to reciprocate in equal value.
- ALAT employees are not permitted to solicit suppliers for gifts including gifts to support charitable causes.
- Suppliers shall not offer an opportunity to purchase products, services, or a financial interest to any ALAT employees under terms not available to all ALAT employees.

CONFLICT MINERALS

- To take reasonable efforts to avoid in its production the use of raw materials which directly or indirectly finance armed groups who violate human rights.

RESOURCES

- If you need additional information or guidance on these standards, or wish to report a potential violation, contact ALAT: aimlab@aimlab.com