Whitehaven

Supplier Code of Conduct

Version 1.0 | 25 June 2025

Supplier Code of Conduct

1.0 Introduction

1.1 Whitehaven Coal and its subsidiaries (Whitehaven) are committed to a responsible supply chain which is aligned with our social and environmental priorities and our commitment to conducting business ethically and with integrity.

1.2 This Supplier Code of Conduct (Code) sets out our minimum requirements for Whitehaven's suppliers regarding workplace health and safety, environmental protection, the protection of labour and human rights, business integrity and anti-corruption.

1.3 We require suppliers providing goods or services to Whitehaven to comply with this Code, and to communicate the requirements herein to their sub-contractors and suppliers supplying goods or services to Whitehaven and hold them to these minimum requirements.

2.0 Health, safety and environment

2.1 All suppliers working at or visiting a Whitehaven site must comply with our corporate and site-specific health, safety and environment policies and procedures.

Workplace health and safety

2.2 Suppliers must:

- comply with applicable laws and regulations governing health and safety at work for their business
- provide a safe and healthy workplace for their workers
- maintain adequate health and safety systems and processes to prevent work-related injuries and occupational diseases of their workforce
- identify workplace health and safety hazards and implement effective preventative and protective measures to, as far as reasonably practicable, protect workers from these hazards
- provide their workers with appropriate training in occupational health and safety and adequate personal protective equipment to perform their duties safely, at no cost to their workers, and
- ensure products and services meet relevant safety certifications.

Environmental protection

2.3 Suppliers must:

- comply with all applicable local and national laws, regulations and requirements to protect the environment, and
- maintain environmental systems and procedures appropriate to their business to avoid adverse environmental impacts and mitigate unavoidable impacts.

3.0 Labour and human rights

3.1 Whitehaven is committed to respecting internationally recognised human rights.

3.2 We expect suppliers' conduct to be consistent with respecting and supporting the protection of their workforce's internationally recognised human rights and comply with rights granted to workers under applicable local and national laws and regulations.

Modern slavery

3.3 The Australian Modern Slavery Act 2018 defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, and the worst forms of child labour.

3.4 Suppliers must:

- ensure that neither it nor any of its personnel breaches any anti-modern slavery laws or regulations in force in Australia
- prohibit any modern slavery practices in their organisation and any contribution to it, and
- take reasonable steps to assess, mitigate and address the risk of modern slavery practices in their organisation and supply chains.

Child labour

3.5 Suppliers must not provide employment to anyone under the minimum legal age for employment as determined by applicable local laws.

Freedom of association

3.6 Suppliers must respect the right of their workers to freedom of association and to enter into collective bargaining to the extent of local national laws.

Discrimination, harassment, bullying and victimisation

3.7 Suppliers must not tolerate any forms of abuse, harassment, bullying or victimisation in their workplaces.

3.8 We expect suppliers to provide a workplace where everyone is treated with respect, which promotes equality of opportunity and treatment in respect of employment and occupation, and which does not discriminate based on race, nationality or ethnic origin, gender, religion, age, disability, marital status, sexual orientation, trade union activity, political views or other diversity factors.

3.9 We expect suppliers to adhere to applicable laws and regulations that impose a positive duty to proactively manage sexual harassment in the workplace.

Grievances and non-retaliation

3.10 Suppliers must provide a grievance mechanism for workers to report workplace concerns without fear of retribution and undertake appropriate processes to address and/or investigate those concerns.

Remuneration and working time

3.11 Suppliers must pay their workers' wages and benefits (including overtime) that at a minimum meet the applicable national legal standard.

3.12 We expect suppliers to fully comply with national laws and industry standards on legal limits for working time.

4.0 Business integrity and anti-corruption

4.1 We expect all our suppliers to share our commitment to conduct business with integrity. Suppliers must:

- comply with all applicable local and national laws and regulations wherever they conduct business
- comply with anti-bribery and corruption laws and not participate in, or become involved in bribery, corruption or fraudulent behaviour
- not give, offer to give, accept or request a bribe in any form, nor permit others to do so in their name
- not make a facilitation payment when undertaking work for or on behalf of Whitehaven
- declare any actual or potential conflict of interest prior to any dealings with Whitehaven, and
- take all reasonable steps to ensure the protection of Whitehaven's information and property and comply with all data protection and data privacy laws.

5.0 Respect Aboriginal and Torres Strait Island Peoples

5.1 Whitehaven seeks to build strong relationships with its local Aboriginal and Torres Strait Islander communities, and to make positive change for Aboriginal and Torres Strait Islander peoples through employment, procurement, skills development and education.

5.2 Suppliers must respect the rights of Aboriginal and Torres Strait Islander peoples and engage with them where their business activities may impact them.

5.3 Suppliers are encouraged to strongly consider employment opportunities for Aboriginal and Torres Strait Islander peoples and report on Indigenous employment numbers in subcontracting arrangements.

6.0 Reporting breaches

6.1 Suppliers must notify Whitehaven in writing as soon as practical after it becomes aware of any actual or reasonably anticipated breach of this Code and co-operate with any subsequent investigation conducted by Whitehaven.

6.2 Suppliers must also take all actions necessary to eliminate the cause of non-compliance with this Code and for human rights violations, provide a sufficient and appropriate remedy.