

Supplier Code of Conduct

1 Our Code

- 1.1 The purpose of this Supplier Code of Conduct (**Code**) is to set out our expectations for all suppliers providing goods and/or services to Envato Pty Ltd and its affiliates (**Envato, us, our, we**).
- 1.2 Envato expects its suppliers to operate consistently with the principles outlined in this Code and to notify us of any breaches. Suppliers must also take reasonable steps to address, remedy and prevent repetition of any breach of this Code or possible breaches of this Code.
- 1.3 We reserve the right to undertake due diligence and risk assessments to verify compliance with our Code and expect our suppliers to cooperate and provide supporting evidence as we may reasonably require to monitor and review their compliance.

2 Your conduct

- 2.1 We seek to work with businesses whose values match our own. We require our suppliers to comply with all applicable laws and, in all cases, to meet the standards and principles set out in this Code across all areas of their business. Compliance with those laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

2.2 **Ethics, anti-bribery and corruption, and sanctions**

Our suppliers must:

- (1) act ethically and with integrity at all times.
- (2) comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion, money laundering or similar or related activities.
- (3) seek to identify and report any conflicts of interest, be it competing personal or professional interests. Our suppliers will avoid even the appearance of conflicts of interest in their work with us.
- (4) in all dealings with us, not engage directly or indirectly in trade activities or include in the supply chain any goods or services sourced from sanctioned persons, countries or organisations; in accordance with all sanctions laws with which we must comply, including local or regional sanctions as mandated by the Government for the relevant jurisdiction applicable to us.

2.3 **Intellectual property, privacy and confidentiality**

Our suppliers must:

- (1) respect intellectual property rights and act in a manner protecting intellectual property rights.
- (2) protect the privacy of personal information of everyone with whom they do business and comply with applicable privacy and data protection laws and regulations.
- (3) safeguard confidential information to which they have access in connection with their provision of goods and/or services to Envato. They must implement security standards and

procedures to ensure that confidential information is securely stored, disclosed only on a need-to-know basis and used only for permitted purposes.

- (4) not retain confidential and proprietary information beyond the period prescribed under applicable laws or such period as required in order to perform its contractual obligations to us, whichever is more restrictive.

2.4 **Diversity and inclusion**

- (1) Our suppliers must comply with all applicable discrimination laws and promote diversity and inclusion within their own workplace.
- (2) Our suppliers must not discriminate based on characteristics including, but not limited to, gender, age, religion, race, ethnicity, language, sexual orientation, marital or relationship status, physical disability, mental or intellectual disability and political opinion.

2.5 **Health and safety**

Our suppliers must comply with all applicable health and safety laws and aim to create a safe working environment for its employees and all people affected by their business.

2.6 **Labour**

- (1) Our suppliers must not use or permit any form of forced, bonded or indentured labour.
- (2) Our suppliers must ensure that employees under the age of 18 do not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.
- (3) Our suppliers must not permit harassment, abuse, corporal punishment or inhumane treatment of their employees.
- (4) Our supplier's employees must be permitted to associate freely, bargain collectively and seek representation in accordance with local laws.

2.7 **Human rights**

- (1) Our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their employees.
- (2) Suppliers must conduct their business activities in a manner that respects human rights and must not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour.
- (3) Our suppliers must have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.

2.8 **Environmental and sustainability**

Our suppliers must:

- (1) comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and natural resources consumption.
- (2) work to reduce consumption of resources, track and seek to improve energy efficiency, energy consumption and greenhouse gas emissions.
- (3) monitor, treat and reduce hazardous air emissions, wastewater and waste generated from its operations.

3 Use of this Code

- 3.1 All new and existing suppliers are required to comply with this Code and demonstrate their commitment to doing so.
- 3.2 Compliance with our Code will be used as part of our supplier evaluation, selection and contract management process.
- 3.3 When a supplier does not meet our requirements, a corrective action plan will be established and monitored for progress. We will terminate the relationship with suppliers that repeatedly and knowingly violate our Code.

4 Questions & concerns

If you have a question or concern about proper conduct or this Code, or would like to report a breach, or a suspected breach, of this Code please raise the issue with your primary Envato contact or use the whistleblowing process set out in [Envato's Whistleblower Policy](#) which is published on our website.