

SUPPLY CHAIN & PROCUREMENT POLICY & GUIDELINES

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Document Change Control

All changes are to be agreed and authorised by the CEO.

Document Change Record

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Document Sign-off

	Signed	Date
CEO		25/02/2025

All changes are logged in the Policies Document Control Register.

1. ABOUT THIS POLICY

- 1.1 Brockwell Energy Limited (“the Company”), along with its subsidiaries and affiliates, is committed to responsible and ethical procurement practices, ensuring that our supply chain supports sustainability, ethical business conduct, and social responsibility. This Supply Chain & Procurement Policy outlines our approach to fair labour practices, supplier accountability, and environmental stewardship, reinforcing our commitment to ethical sourcing and sustainable supply chain management.
- 1.2 This policy applies to all Brockwell Energy procurement activities, including corporate operations and project sites. It establishes the standards for supplier engagement, sustainable sourcing, and fair labour practices, ensuring that all contractors, suppliers, and business partners operate in line with our ethical and environmental commitments. This policy is applicable to all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers involved in procurement and supply chain management.
- 1.3 Brockwell Energy is dedicated to embedding responsible procurement principles into all aspects of our business. While procurement activities may be conducted by project managers or contractors, the Company maintains oversight to ensure transparency, compliance with ethical standards, and accountability across our supply chain.
- 1.4 This policy does not form part of any employee's contract of employment and may be updated by the Company to reflect evolving supply chain risks, sustainability goals, and regulatory requirements.
- 1.5 This policy aligns with Brockwell Energy’s Sustainability Policy and Corporate Social Responsibility (CSR) Policy, ensuring that our procurement activities contribute to environmental stewardship, ethical sourcing, and responsible business practices. It also supports the principles outlined in the Diversity, Inclusion & Equality (DEI) Policy, reinforcing our commitment to inclusive and fair supplier engagement, equal opportunities, and ethical labour standards throughout our supply chain.
- 1.6 This policy aligns with Brockwell Energy’s Anti-Slavery & Human Trafficking Policy, reinforcing our zero-tolerance approach to forced labour, human trafficking, and exploitative employment practices. All suppliers and contractors must ensure compliance with international labour standards, ethical employment conditions, and transparent working practices.

2. WHO IS RESPONSIBLE FOR THIS POLICY?

- 2.1 The Board of Directors has overall responsibility for ensuring the effective implementation and operation of this Supply Chain & Procurement Policy. The Board is committed to fostering a culture of ethical procurement, responsible sourcing, and transparency, ensuring that Brockwell Energy’s supply chain aligns with sustainability goals, fair labour practices, and ethical business conduct.
- 2.2 All managers involved in procurement and supply chain activities are responsible for ensuring compliance with this policy, integrating ethical, environmental, and social responsibility principles into supplier selection, contract management, and procurement processes. Managers must also ensure that suppliers, contractors, and stakeholders uphold Brockwell Energy’s commitments to fair labour practices, sustainability, and ethical sourcing, and take corrective action when these standards are not met.
- 2.3 Staff, contractors, and stakeholders are encouraged to report any concerns related to procurement ethics, supplier conduct, or compliance with this policy. Open communication is essential to maintaining a transparent, responsible, and fair supply chain, and all concerns will be addressed promptly and appropriately.

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- 2.4 Any questions about this policy, as well as requests for guidance, support, or training on responsible procurement practices, should be directed to the Company.
- 2.5 Employees, suppliers, and stakeholders are invited to provide feedback and suggest improvements to enhance Brockwell Energy's commitment to ethical, sustainable, and socially responsible procurement.
- 2.6 Brockwell Energy's commitment to responsible supply chain management and ethical procurement is also reflected in our Ethics & Code of Conduct Policy, which defines the ethical standards and governance principles that guide our business relationships, supplier engagements, and stakeholder interactions.
- 2.7 Concerns related to procurement ethics, supplier conduct, or policy compliance can also be reported through Brockwell Energy's Whistleblowing Policy, which provides confidential, independent, and legally protected reporting channels. Employees, suppliers, and contractors are encouraged to report suspected violations, ensuring accountability and transparency across our supply chain.

3. PURPOSE

- 3.1 The Supply Chain and Procurement Policy outlines Brockwell Energy's commitment to responsible sourcing and ethical procurement practices. This policy sets the standards for selecting and working with suppliers, ensuring our supply chain aligns with our values of sustainability, integrity, and respect for human rights.

4. SCOPE

- 4.1 This policy applies to all procurement activities and supplier relationships at Brockwell Energy. It guides the selection, evaluation, and management of suppliers and contractors across all projects and operations.

5. COMMITMENT

- 5.1 Brockwell Energy is committed to building a supply chain that reflects our dedication to quality, sustainability, and ethical business practices. We prioritise suppliers who align with our environmental and social standards, promoting shared value and responsible growth.
- 5.2 Our commitment to responsible sourcing and fair labour practices aligns with Brockwell Energy's Recruitment Policy, ensuring that hiring, onboarding, and contractor selection processes support diversity, inclusion, and ethical employment.

6. PRINCIPLES

- 6.1 Our approach to supply chain and procurement is based on the following principles:
- **Sustainable Sourcing:** We seek suppliers who demonstrate a commitment to environmental stewardship, aiming to minimise our collective impact on the planet.
 - **Ethical Standards:** We expect suppliers to uphold high ethical standards, including respect for human rights, fair labour practices, and anti-corruption measures.
 - **Local and Inclusive Procurement:** Where possible, we prioritise local suppliers and foster diversity within our supply chain, supporting economic resilience in the communities we work in.

- 6.2 We also recognise the importance of fostering an inclusive supply chain. Our approach to supplier engagement is consistent with Brockwell Energy's Diversity, Inclusion & Equality (DEI) Policy, ensuring that procurement practices promote supplier diversity, equal opportunities, and social impact.

7. IMPLEMENTATION

Supplier Selection and Evaluation

- 7.1 Brockwell Energy's supplier selection process prioritises companies that align with our values. We evaluate potential suppliers based on environmental practices, social responsibility, quality, and compliance with regulatory standards.

Sustainability and Environmental Responsibility

- 7.2 We work with suppliers who actively promote sustainability within their operations. This includes practices such as using recycled materials, reducing emissions, and conserving resources. Suppliers are expected to adopt eco-friendly practices that contribute to a low-carbon economy.

Compliance with Ethical Standards

- 7.3 All suppliers must comply with Brockwell Energy's ethical expectations, including adherence to anti-corruption, anti-bribery, and human rights standards. We partner with suppliers who share our commitment to ethical, transparent, and fair business practices.
- 7.4 All suppliers and contractors must comply with Brockwell Energy's Bribery & Anti-Corruption Policy, ensuring that procurement activities are conducted with the highest standards of integrity, free from fraud, bribery, or unethical business conduct.

Local and Responsible Procurement

- 7.5 We prioritise local suppliers wherever feasible, supporting local businesses and economies. Brockwell Energy also encourages the inclusion of diverse suppliers, including small businesses and minority-owned enterprises, to enhance resilience in our supply chain.

Ongoing Supplier Management

- 7.6 Brockwell Energy proactively audits, monitors, and evaluates supplier performance to ensure compliance with our ethical, environmental, and social standards. We maintain open and structured communication with suppliers, offering support for continuous improvement while maintaining the right to take corrective action, impose sanctions, or terminate contracts if non-compliance is identified.

Transparency and Accountability

- 7.7 Brockwell Energy holds suppliers accountable for meeting the requirements outlined in this policy. We require suppliers to report any significant changes or challenges that may impact their ability to uphold our standards, reinforcing a transparent and responsible supply chain.

8. CONCLUSION

- 8.1 This Supply Chain and Procurement Policy reflects Brockwell Energy's dedication to building a responsible, resilient, and sustainable supply chain. By partnering with suppliers who share our commitment to ethical practices, environmental responsibility, and social impact, we create lasting value that extends beyond our projects.