

SUPPLIER CODE OF CONDUCT

Setting the standards for our suppliers work with us

NQA
North Queensland Airports

Last updated 12 August 2025

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NQA North Queensland Airports operating Cairns airport | MackayAirport

SCOPE AND APPLICABILITY

What we achieve is important - so is **how** we achieve it.

We are committed to conducting our business with integrity, professionalism, and full legal compliance. We recognise that our reputation and continued business success depends on this. We expect the same high standards of lawful and ethical business conduct from our suppliers.

This Supplier Code of Conduct sets out the minimum standards of conduct and behavior that we require from our suppliers.

This Code applies to all suppliers, service providers, contractors and consultants (**Suppliers**) engaged by any member of the North Queensland Airports Group, which includes our Cairns Airport, Mackay Airport and the Mackay Airport Ibis Hotel businesses (collectively, **NQA**).

Suppliers must comply with this Code at all times when providing products, services or performing any work for any member of the NQA Group.

This applies to both onsite and offsite activities.



SAFE, HEALTHY, AND SECURE WORKPLACE



NQA is committed to Safety Every day. When onsite at NQA, Suppliers must ensure their conduct (including the conduct of their staff and contractors) fosters a safe, secure, and healthy environment for all people who work and visit NQA facilities.

As a Supplier, what do I need to do?

- Comply with all applicable health and safety laws and regulations.
- Take care of the health and safety of your staff and contractors and the health and safety of others. Ensure all personnel receive appropriate training, are adequately supervised, and use suitable personal protective equipment.
- Provide a safe and healthy work environment for your staff and contractors. Take proactive measures to prevent workplace hazards and incidents.
- Comply with all NQA policies, procedures, and site permissions related to working onsite, including all safety and security instructions.
- Do not allow your staff to attend any NQA site or carry out any work for NQA (either onsite or offsite) under the influence of any illicit drugs or alcohol.
- Report near misses, hazards, and safety incidents to NQA.
- Immediately report all security matters, crime, and suspicious events to NQA.

As a Supplier, what do I need to do with respect to environmental matters?

- Operate in an environmentally responsible manner. This includes complying with environmental laws, minimizing waste and emissions and using resources efficiently.
- Protect our environment, biodiversity, habitats and waterways.
- Manage your carbon, waste and energy footprint.
- Where possible, implement cost effective methods for energy efficiency and consumption.
- Complete all relevant environmental inductions when requested to do so by NQA.

ETHICAL BUSINESS CONDUCT

NQA conducts its business with integrity, accountability, social responsibility and to high ethical standards. We expect our Suppliers to do the same. Fraud, dishonesty, unethical behavior or unlawful conduct on the part of a Supplier or anyone doing business with NQA will not be tolerated.

As a Supplier, what do I need to do?

- Act as a responsible corporate citizen and maintain an ethical and lawful reputation at all times.
- Ensure your business dealings with NQA are ethical, socially responsible, and legally compliant.
- Conduct your business ethically with honesty, with integrity, accountability, probity, and fairness. This includes avoiding corruption, bribery, and actual or perceived conflicts of interest.
- Do not make improper use of an individual's position or benefit from practices which are dishonest, unethical or unlawful.
- Report any unethical behavior, fraud, dishonesty, criminal conduct, or any other form of misconduct in connection with your business dealings with NQA, directly to NQA.



PROFESSIONAL AND LAWFUL BUSINESS CONDUCT

Suppliers must act professionally and lawfully at all times.

As a Supplier, what do I need to do?

- Comply with this Supplier Code of Conduct and establish procedures to ensure compliance with this Code.
- Conduct your business dealings with NQA in a professional and lawful manner.
- Ensure that your conduct, and that of your staff, does not damage NQA's reputation.
- Comply with all laws and regulations applicable to your business, including those relating to labour, health and safety, environment and anti-corruption.
- Do not engage in any form of misleading or deceptive conduct, anti-competitive conduct, bribery or corruption.
- Take accountability and responsibility for the actions of your staff and contractors.
- Notify NQA if you become aware of a breach of this Code.



PREVENT INAPPROPRIATE BUSINESS DEALINGS

Suppliers must ensure that they do not, and their staff and contractors do not, engage in any form of inappropriate business dealing.

As a Supplier, what do I need to do?

- Do not engage in any form of anti-competitive conduct or conduct that breaches any competition or anti-trust laws.
- Do not engage in misleading or deceptive conduct.
- Avoid any actual or perceived conflicts of interest and declare the nature of any relationships with stakeholders that may be a real or perceived conflicts of interest.
- Comply with all applicable privacy and antidiscrimination laws.
- Comply with all applicable export control laws and trade sanction laws and do not obtain products or services from a country the subject of an applicable government trade sanction or embargo.
- Maintain mechanisms for employees and stakeholders to report concerns about unethical or unlawful behavior or inappropriate business dealings without fear of retaliation.
- Ensure all your staff, business partners, contractors, and subcontractors comply with all applicable laws.



PROHIBIT FRAUDULENT AND CORRUPT CONDUCT



NQA has zero tolerance for fraud or corruption. Suppliers must not offer, promise, authorise, recommend, give or receive (directly or indirectly), anything of value to any person if it is intended, or could reasonably be intended, to influence an improper action, obtain or retain business or secure an improper advantage.

As a Supplier, what do I need to do?

- Do not (and ensure that your staff and contractors do not) commit any form of bribery, fraud, corruption or money-laundering.
- Comply with anti-bribery laws, the Criminal Code Act 1995 (Cth), the Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024 (Cth), and the Criminal Code 1899 (Qld).
- If you become aware of, or reasonably suspect, that any fraud, bribery or corruption, secret payments, secret commissions, money laundering, or any other form of misconduct in connection with your dealings with NQA, or in connection with NQA, report your concerns directly to NQA.

NQA has engaged an independent company, Your Call, to host and manage our Whistleblower Hotline. Concerns can be reported anonymously to Your Call.

WHISTLEBLOWER HOTLINE: YOUR CALL
Accessible 24/7, 365 days a year

1300 790 228
www.yourcall.com.au/report
Employer ID: CA1990

WORKING CONDITIONS AND MODERN SLAVERY

NQA does not tolerate any form of discrimination in hiring or employment practices. Suppliers must maintain socially responsible working conditions and identify and mitigate modern slavery risks.

As a Supplier, what do I need to do?

- Conduct your business in a socially responsible, non-discriminatory manner. Uphold human rights of staff and contractors and treat them with dignity and respect. This includes prohibiting forced labour, child labour, discrimination and harassment.
- Compensate your staff fairly and in compliance with laws.
- Comply with all applicable laws, including laws relating to equal opportunity, compulsory labour, working hours and conditions, freedom of association, and harassment free workplaces.
- Do not engage in any form of discrimination based on race, colour, religion, age, sexual orientation, gender, ethnicity, nationality, disability, pregnancy, political affiliation, union membership, marital status, genetic information, or any other characteristic protected by law.
- Ensure workplace concerns can be raised without retaliation and protect the rights of vulnerable and marginalised workers most at risk of discrimination.
- Ensure your operations and supply chains do not engage any form of child labour. All staff and contractors must meet the minimum legal working age, or be at least 15 years old if no minimum age is specified by law in the jurisdiction of employment.



As a Supplier, what do I need to do about modern slavery?

- Do not engage in any form of modern slavery in your operations and do not knowingly engage in any form of modern slavery in your supply chains.
- Comply with all applicable modern slavery laws and take proactive steps to identify, monitor and mitigate risks of modern slavery in your operations and supply chains.
- Notify NQA if you become aware of or reasonably suspect any form of modern slavery in your operations or supply chains.

PROTECT NQA INFORMATION AND INTELLECTUAL PROPERTY

Suppliers must ensure all NQA personal information, proprietary, confidential and commercially sensitive information, whilst in the Supplier's possession or control, is safeguarded and handled in accordance with applicable laws, confidentiality obligations and contract requirements and NQA policies. Suppliers must also comply with Intellectual Property laws and must not infringe the intellectual property rights of others.

As a Supplier, what do I need to do?

- Comply with all applicable data privacy laws. Securely protect NQA data and information in your possession or control.
- Limit your use of NQA personal information, proprietary, confidential or commercially sensitive information, to use for lawful and legitimate purposes to provide products or services or perform work for NQA, in compliance with your legal and contractual obligations.
- Do not disclose information obtained through business dealings with NQA to third parties without our authorisation or as required by law.
- Comply with all applicable intellectual property laws and regulations, including in relation to patents, copyright, trademark, trade secrets and other intellectual property rights. Do not engage in any unauthorised use, reproduction or distribution of intellectual property or breach the intellectual property rights of others.
- Ensure that your products and services do not infringe the intellectual property rights of any third party.



SUPPLIER INSPECTIONS AND AUDITS

From time to time, we may ask Suppliers to complete a Supplier Questionnaire to support us with our risk assessment practices and modern slavery reporting obligations. We may undertake Supplier inspections or audits to support a culture of accountability, transparency risk mitigation and strong business relations, and we reserve our right to assess and monitor Supplier compliance with this Code.

As a Supplier, what do I need to do?

- Complete our Supplier Questionnaires when requested to do so by NQA.
- Facilitate an NQA audit or inspection of your facilities or work if requested to do so in writing by NQA, in compliance with relevant legal and contractual requirements.



REPORTING MISCONDUCT

If you become aware of or reasonably suspect:

- a breach of this Code of Conduct,
- misconduct,
- breach of law, or
- improper state of affairs or circumstances

in relation to your dealings with NQA, or any NQA activity or stakeholder, please report it to us.

Avenues for reporting include:

- To the NQA General Manager responsible for your engagement, our CEO, or General Counsel and Company Secretary.
- To our Whistleblower Hotline, managed by 'Your Call', an independent third party and available 24/7.

Whistleblower complaints can be made anonymously through the Your Call Whistleblower Hotline.

Suppliers and their families can access this Hotline to make whistleblower complaints through this service.



WHISTLEBLOWER HOTLINE: YOUR CALL

Accessible 24/7, 365 days a year

1300 790 228

www.yourcall.com.au/report

Employer ID: CA1990

SUPPLIER ACKNOWLEDGEMENT

The Supplier acknowledges that they have read, understood and agree to comply with the North Queensland Airports Group Supplier Code of Conduct.

The Supplier further agrees to ensure that all employees, agents, and subcontractors that the Supplier involves in supplying goods or services to NQA are made aware of and comply with this Code.

SUPPLIER NAME: _____

NAME OF AUTHORISED REPRESENTATIVE: _____

POSITION TITLE: _____

SIGNATURE: _____

DATE OF SIGNING: _____

SUPPLIER ADDRESS: _____



CAIRNS AIRPORT
ABN 18 132 228 221
ACN 132 228 221
Airport Ave Cairns City QLD 4870
www.cairnsairport.com.au

MACKAY AIRPORT
ABN 77 132 228 534
ACN 132 228 534
Boundary Rd East Mackay QLD 4870
www.mackayairport.com.au

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