



# Procurement Policy

---

**Coronado Global Resources Inc. (Australian operations)**

<b>Document name:</b>	Procurement Policy
<b>Document version:</b>	1.3
<b>Document date:</b>	21 October 2024
<b>Document review due:</b>	As required by the Policy Owner

<b>VERSION HISTORY</b>				
<b>Version</b>	<b>Description</b>	<b>Date</b>	<b>Prepared by</b>	<b>Approved by</b>
1.2	Update of Company name	27/01/2022	Sarah Williams	Imran Mateen
1.3	Various Updates to support establishment of Business Partner Responsible Procurement Code	21/10/2024	Policy Owner with support Legal and Sustainability Team	Policy Owner

## 1. OVERVIEW

---

### 1.1. Purpose

This policy has been developed to support the goals of operating excellence in an ethical and sustainable manner, and outline the governance applied to all procurement activities. All employees/contractors/agents are to exercise appropriate care in the expenditure of funds in accordance with budget allocations and this policy.

### 1.2. Policy owner

The Vice President – Finance and Commercial-Australia (or equivalent role from to time) is the owner of this policy on behalf of the Coronado Global Resources Inc. (referred to in this policy as CGR, Coronado or the Company) Australian operations. Questions or clarification regarding this policy can be made to the Category Management Team.

The policy owner will review this policy periodically to ensure it remains relevant and meets CGR's operating and strategic requirements.

## 2. SCOPE OF THIS POLICY

---

### 2.1. Scope

This policy only applies to the Australian operations and does not extend to CGR operations in the United States, or elsewhere, as relevant.

### 2.2. Procurement activities

This policy covers activities for the procurement of all goods and services, either purchased, leased, or hired for and on behalf of the Australian operations of CGR.

### 2.3. Who must comply?

This policy applies to all employees and contractors, and covers all goods and services purchased, leased or hired by CGR Australian operations. To assist in complying with this policy, the Business Partner Responsible Procurement Code is to be provided to all contractors and any third parties working for or on behalf of the Company. To the extent of any inconsistency between this policy (or any other CGR policy) and the Business Partner Responsible Procurement Code, this policy (or relevant CGR policy) will prevail.

### 2.4. Breaches of this policy

Breaches of this policy or applicable laws may result in disciplinary and/or legal action, and in the case of external parties including consultants, agents, contractors or suppliers, may result in their contract being terminated or not renewed.

## 3. PRINCIPAL OBJECTIVES

---

CGR will ensure that the procurement process is fair to all parties and use its best endeavours to demonstrate impartiality to tenderers and potential suppliers.

More specifically, it aims to:

- a) Establish a framework to select the option that is consistent with Best Value and CGR's principles;
- b) Ensure that due consideration is made in procurement decisions of how suppliers contribute socially to the local community; and
- c) Achieve value for money outcomes.

It is essential for procurement probity that the procedural matters are understood and adhered to by all employees.

## **4. GENERAL GUIDELINES**

---

### **4.1. Procurement controls**

All procurement activities from selected approved or evaluated suppliers:

- a) Shall be in compliance with the 'CGP1.2 Procurement and Contracts (P&C) Procedure';
- b) Shall be in accordance with approved budgets;
- c) Shall be authorised as per CGR's Business Delegations of Authority Policy;
- d) Shall be conducted by authorised and qualified staff with suitable technical qualifications or prior experience; and
- e) Shall meet specified requirements.

### **4.2. Value for money**

A core purpose of Coronado's procurement is to support the organisation's objectives by achieving best value for money when buying goods and services.

Value for money relates not only to purchase price, but also factors such as fitness for purpose, reliability, availability, delivery cost, operating cost, after sales support and warranties. Decisions on the basis of value for money must be supported by objective evidence of cost benefits and structured procedural steps.

### **4.3. Open and effective competition**

Open and effective competition must be evidenced in obtaining goods and services. It requires that procurement is transparent and that there is an opportunity for potential suppliers to be aware of Coronado's business requirements.

There is a need to show the following conditions exist for a given purchase.

- a) Timely approach to market;
- b) Availability of alternative providers and offers;
- c) Absence of bias and favouritism; and
- d) Opportunity of entry for new and local sellers.

### **4.4. Procurement ethics**

Honesty and impartiality are key elements in a professional procurement framework. Information obtained from prospective suppliers, either oral or written, is Commercial-in-Confidence and must not be disclosed to other suppliers or personnel not authorised to receive it.

To enable Coronado to deal with its' suppliers on a basis of mutual trust and conduct business fairly and with integrity, all personnel involved in a procurement process should ensure they:

- a) Recognise and declare conflicts of interest and interests of a financial nature;
- b) Deal with suppliers equally;
- c) If in doubt seek appropriate governance advice;
- d) Do not compromise Coronado's standing by accepting gifts or hospitality; and
- e) Comply with all legal obligations.

### **4.5. Identify and manage conflicts of interest**

Workers' personal interests should not conflict with duties and obligations to CGR. A conflict of interest may arise if workers have a direct or indirect (through a family member, friend or associate) financial interest in a business that has commercial arrangements with the Company.

To manage conflicts of interest, workers must:

- a) Immediately disclose any actual or perceived conflicts of interest to their line manager;
- b) Seek approval from their line manager before accepting any outside business interests including non-Coronado work, business ventures, directorships (other than to a board of a non-trading family company), partnerships or other interests which have the potential to create a conflict of interest;
- c) Keep an arm's length relationship when dealing with customers and suppliers; and
- d) Document any actual, potential or perceived conflicts, or as directed by their manager.

#### **4.6. Bribery**

Bribery is the act of offering, promising, giving or accepting a benefit or something of value, either directly or indirectly, in order to provide Coronado with business or an advantage or to induce or reward improper conduct or an improper decision. The relevant laws apply to the bribery of public officials as well as bribery in respect of any commercial transaction. Merely offering a bribe will usually be sufficient for an offence to be committed.

Bribery can take many forms. The benefit that is offered, given or accepted may be monetary or non-monetary. For instance, it may involve non-cash gifts, political or charitable contributions, loans, favours, business or employment opportunities, some gifts, hospitality, entertainment or travel, or anything else that is of value to the recipient.

Bribery may be indirect, for example where:

- a) A person procures an intermediary or an agent to make an offer which constitutes a bribe to another person.
- b) An offer which constitutes a bribe is made to an associate of a person who is sought to be influenced.

Workers must not give, offer, promise, accept or request a bribe and must not cause a bribe to be given, offered, promised or accepted by another person. Under no circumstances will Coronado approve of any offers, or make, request or receive an irregular payment or other thing of value, to win business or influence a business decision in Coronado's favour.

All gifts, hospitality and incentives offered to an employee whether accepted or refused should be documented in the Gift and Hospitality Register.

Refer to the Code of Business Conduct and Ethics for further details.

#### **4.7. Antitrust, Competition and Consumer Laws**

The federal governments of the United States and Australia, most state governments, and many foreign governments have enacted antitrust or "competition" laws intended to preserve independent competition among competitors and prohibit activities that are unreasonable restraints of trade. Certain types of restraints are always considered to be illegal under the laws of the United States, Australia and many countries, and workers must be alert to avoid even the appearance of such conduct.

Some clear examples of antitrust violations are: price fixing, bid rigging, market or customer allocation, production allocation and group boycotts such as joint refusals to deal. If a worker violates the antitrust laws, the worker may be subject to personal criminal liability, including fines and imprisonment. Coronado may also be exposed to both criminal and civil liability, including civil damages. Workers must not engage in any prohibited activity and must strive to avoid even the appearance of a possible violation. Workers with sales and marketing responsibilities or commercial contacts or who attend trade association or industrial group meetings must be particularly aware of these obligations under the antitrust laws.

#### **4.8. Procurement authority**

Authority to commit to the expenditure of funds is governed by specific delegations according to the CGR Business Delegations of Authority Policy.

The delegations are specific to certain positions within Coronado and cannot be delegated to any other person without approval.

The nominated delegates and monetary limits to the delegation are as per the Business Delegations of Authority Policy.

#### **RELATED DOCUMENTS**

- CGP1.2 Procurement & Contract (P&C) Procedure
- CGP1.3 – Procurements & Contract RACI
- Business Partner Responsible Procurement Code
- Code of Business Conduct and Ethics
- Anticorruption Policy
- Business Delegations of Authority Policy
- Environment Policy
- Inclusion and Diversity Policy
- Local content policy
- Modern Slavery Statement
- Whistleblowing Policy
- Work Health and Safety Policy