Buildcorp

Ethical Business Conduct Policy

OVERVIEW

Buildcorp Group maintains a high standard of integrity and professionalism. To sustain our reputation and earn our clients' trust we:

- conduct all business in an honest and ethical manner
- are committed to acting professionally, fairly and with integrity in all business dealings and relationships.
- do not permit the making of any inappropriate promises, gifts, or excessive hospitality to achieve unfair advantage or benefit; and
- comply with all relevant laws within the jurisdictions where we operate.

OBJECTIVES

This policy seeks to ensure that:

- employees take an ethics-based approach to how they conduct themselves delivery of their duties
- collusive tendering practices are prevented
- employees do not off offer gifts or benefits to influence a tendering process
- employees do not accept gifts or benefits that could compromise their integrity and objectivity in performing their duties
- there are zero incidences of bribery and corruption.

CONSIDERATIONS

Bribery and corruption

Buildcorp has a zero tolerance for employees giving, offering, promising, accepting, requesting, or authorising a bribe in any business activity. Bribery is not lawful in any country. Payment of a bribe by a person within Buildcorp may result in that person and/or Buildcorp being liable to prosecution under a foreign law.

To mitigate this risk, we:
- expressly prohibit the giving, receiving, offering, promising, requesting, or authorising of a bribe
- oppose facilitation payments as a means of doing business, understanding that is it illegal in all countries except Australia, New Zealand, South Korea, and the United States
- insist business activities must be transparent, sufficiently documented, and above suspicion
- expect due diligence on those who are doing business with, or on behalf of Buildcorp
- we expect our business partners and Agents to implement and enforce effective systems to counter bribery and corruption.

Buildcorp complies with all relevant laws relating to bribery and corruption including:

- the Australian Criminal Code Act 1995 (Cth), Corrupt Practices Act 1977
- Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)
- Anti-Money Laundering and Counter Terrorism Financing Rules 2007 (Cth)
- any related laws that require compliance even where business activity may be carried out in another country
- reporting and accounting obligations imposed by regulators and/or enforcement agencies.

Conflict of interest

Conflict of interest arises whenever the personal, professional, or business interests of an employee are potentially at odds with the best interests of Buildcorp. To prevent and issues arising, employees should:

- declare any potential, actual or perceived conflicts of interest that exist on becoming employed by Buildcorp to management
- declare any potential, actual or perceived conflicts of interest that arise or are likely to arise during employment with their manager
- avoid being placed in a situation where there is potential, actual, or perceived conflict of interest if possible

If an employee declares such an interest, Buildcorp will review the potential areas of conflict with the employee and mutually agree on practical arrangements to resolve the situation.

Gifts and entertainment

The practice of giving corporate gifts and arranging corporate entertainment is commonplace in the Construction industry. To mitigate risk, we have the following measures in place:

- employees should consider the business relevance when receiving a gift or event invitation
- when accepting a gift or invitation if an employee feels they may be compromised as a result, they should decline the opportunity
- employees are required to declare all gifts and benefits, valued at $500 or more in the Gift and Entertainment Register within three business days of receiving
- gifts and entertainment exceeding a value of $1000 must receive General Manager approval before accepting.

Sponsorship and donations

Requests for sponsorship and donations from Buildcorp should be considered in line with our Donations and Sponsorship Policy. We do not permit political donations of cash, goods, or services to be made on behalf of Buildcorp.

Client Confidentiality

A critical element in our relationship with clients is our promise to keep our knowledge of their private business affairs confidential. When managing client information, we:

- never use opportunities to gain client information or trade secrets unless the client provides the information under the terms of the contract
- only use client information for business purposes
- refrain from discussing the company or our client's business, confidential, sensitive or company information with anyone who does not have a legitimate business-related reason to know
- exercise particular care when discussing or conducting business in public places such as restaurants, social gatherings, hotels, airports, lifts, and taxis
- use good judgement when using mobile phones, the internet, speaker phones and other forms of unsecured communication
- abide by any non-disclosure, confidentiality, or exclusivity agreements, unless obligated by law to disclose or report such information.

MANAGEMENT CONTROLS

We have robust management controls in place to manage ethical risk, including:

- audits to provide assurance that internal controls are effective
- keeping financial records which are independently audited annually
- our financial control system prevents any accounts from being kept 'off book'
- evidence the business reason for making any payments to third parties I required on all transaction of this nature
- reporting of any attempt to (including suppliers, customers, or clients) to unfairly affect any official decision-making process to achieve unfair advantage or benefit.
- performing regular reviews of the register to identify and manage any emerging
- online and in person training make employees aware of and understand their obligations in relation to this policy
- a whistleblowing mechanism in place to raise concerns anonymously if not comfortable raising directly with Buildcorp management.

RESPONSIBILITY & ACCOUNTABILITY

Position	Accountability
Managing Director Buildcorp Group	Policy owner and oversight of policy across the Group
Business Unit General Managers	Maintain and implement policy
Head of People and Culture	Oversight and maintenance of the Gift and Entertainment Register

Chief Financial Officer	Oversight and maintenance of Financial Controls
Employees	Understanding and adherence of policy and procedures

DEFINITIONS

Term	Definition
Corruption	Corruption is the abuse of entrusted power for private/personal gain. Corruption can appear in the form of bribery, trading in influence, patronage, nepotism, cronyism and parochialism, fraud, embezzlement, and kickbacks
Bribery	Bribery involves giving, offering, or promising a benefit (monetary or otherwise) to a person where the benefit: • is not legitimately due • is given or offered with the intention of influencing a person within the public or private sector in the exercise of their duties or functions; and is given or offered with the intention of obtaining or retaining business or a business advantage that is not legitimately due.
Facilitation payment	Facilitation payments are typically minor unofficial payments to Public Officials either directly or indirectly to expedite or secure the performance of routine government action (for example, to facilitate the expedition of applications for visas or licenses). This practice is illegal in all countries except Australia, New Zealand, South Korea, and the United States
Money Laundering	Money laundering is the process by which a person or entity conceals the existence of an illegal source of income and then disguises that income to make it appear legitimate.

RELATED POLICIES & DOCUMENTS

- Modern Slavery Statement
- Modern Slavery Procedure
- Responsible Procurement Policy
- Supplier Code of Conduct

APPROVAL & REVIEW

Position	Role	Date	Next Review
Chief Financial Officer	Owner	7 July 2025	June 2026
Managing Director	Approver	7 July 2025	