

**SUPPLIER
CODE OF
CONDUCT**

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Acknowledgement of Country

Buildcorp acknowledges the traditional owners of the lands on which our offices are based and on which we work. We honour their connection to the land, waters and sky and pay our respects to their Elders past present and emerging. We walk together on Country in the spirit of reconciliation.

1. Overview

- 1.1 Buildcorp is an acknowledged leader in providing new build, fit-out, refurbishment, remedial building and architectural joinery services to its clients in New South Wales, Queensland and Victoria. Projects range in size from \$1m to \$100m+.
- 1.2 Buildcorp is fully aware of the responsibility we bear towards our clients, employees and the communities in which we work. Therefore, we have given ourselves a strict set of ethical standards to guide us in our business dealings.
- 1.3 We expect all our suppliers (i.e. all companies who do business with any company or division of Buildcorp), to adhere to the same ethical standards. For this purpose, Buildcorp has prescribed the Supplier Code of Conduct, which sets the minimum standards for doing business with any suppliers.

2. Law and ethical standards

- 2.1 The supplier shall comply with all laws applicable to its business. The supplier should support the principles of the United National Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. This specially applies to all aspects of Human Rights and Fair Labour Practices set out below.

3. Human rights and fair labour practices

Modern Slavery

- 3.1 Buildcorp is required to comply with the Commonwealth Modern Slavery Act 2018 (the Act) to identify and address Modern Slavery risk and maintain a responsible and transparent supply chain. Our suppliers are expected to comply with all requests made by Buildcorp to assist in our compliance with the Act, including but not limited to providing supplier information and participation in traceability studies of the supply chain.

Child labour

- 3.2 The supplier shall not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it shall be 15 years of age. Workers under the age of 18 shall only perform work in accordance with legal requirements (e.g. with regards to working time, wages and working conditions) and subject to any requirement regarding education or training.

Forced labour

- 3.3 The supplier shall not use any form of forced, bonded or involuntary labour. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier shall be responsible for payment of all fees and expenses (e.g. licences and levies) relating to workers, where legally required.
- 3.4 Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

Compensation and working hours

- 3.5 The supplier shall comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. The supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.
- 3.6 Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted and even where legally permitted, should be minimised.

Freedom of association and collective bargaining

- 3.7 The employees of the supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. The supplier recognises and respects the right to collectively bargain in accordance with applicable laws.

Diversity and inclusion

- 3.8 The supplier shall promote an inclusive work environment that values the diversity of its employees. The supplier shall not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under applicable laws.
- 3.9 Buildcorp has a commitment to delivering an inclusive supply chain through support for Indigenous and Female-owned businesses and Social Enterprises. Our suppliers are expected to share a commitment to supporting diversity of supply chain and look for opportunities to support these types of businesses where possible.

Work health and safety

- 3.10 Buildcorp expects its suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate to business. The supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Employees are to be adequately educated and trained in health and safety issues.

4. Other standards and regulations

Data protection and disclosure of information

- 4.1 The supplier shall adhere to relevant data protection and security laws as well as to respective regulations, in particular, personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected, processed, transmitted, used or retained.
- 4.2 The supplier shall safeguard and make only appropriate use of confidential information. The supplier shall not disclose any information that is now known to the general public.

Bribery and corruption

- 4.3 The supplier shall comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards. The supplier shall not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official or act to secure improper advantage in order to obtain or retain business.

Trade regulation

- 4.4 The supplier shall comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.

Money laundering and financial records

- 4.5 The supplier shall comply with applicable laws and regulations designed to combat money laundering activities. The supplier shall maintain financial records and reports according to international laws and regulations.

Fair competition

- 4.6 The supplier shall comply with applicable competition and anti-trust laws.

Conflicts of interest

- 4.7 A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict of interest situations include a relationship by blood or marriage, partnership, business relationship, business partnership or investment. The supplier shall disclose any actual or potential conflict of interest with Buildcorp personnel.

Environment

- 4.8 The supplier shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.
- 4.9 Buildcorp has made a commitment to reach Net Zero carbon emissions by 2040. Suppliers are expected to support this commitment by providing all relevant information and data pertaining to building materials, products and services they deliver, including information regarding supply chain and transportation. We also expect our suppliers to take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them.

Business continuity planning

- 4.10 The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases, worker shortages). This preparedness especially includes disaster plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

5. This code of conduct

Business partner dialogue

- 5.1 The supplier shall encourage its own suppliers to adhere to this Supplier Code of Conduct as part of fulfilling their contractual obligations.

Compliance with the Supplier Code of Conduct

- 5.2 Buildcorp reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. Buildcorp encourages the supplier to implement its own binding guidelines for ethical behaviour.
- 5.3 Any breach of the obligations stipulated in this Supplier Code of Conduct is consider a material breach of contract by the supplier.

6. Declaration

We hereby confirm we have received the Supplier Code of Conduct of Buildcorp Group Pty Limited.

We further confirm the Supplier Code of Conduct will apply to any existing and future contractual relationship with Buildcorp Group Pty Limited and/or its related parties and subsidiaries.

Company Name

Signature of Authorised Person

Title/Position

Name of Authorised Person (Print)

Date

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