

# SUPPLIER CODE OF CONDUCT



## Our commitment

ADCO is committed to operating with integrity and to the highest ethical standards. We are conscious of the responsibilities we bear towards our clients, employees and the communities in which we work. We follow a strict set of ethical standards to guide us in our business dealings and we expect that the same high standards are adopted and promoted by our supply chain to support ADCO in achieving its commitments and those of our clients.

This Code applies to all relationships in our supply chain, including subcontractors, suppliers and service providers (Trade Partners). As a Trade Partner, it extends to the conduct of your personnel (whether they be permanent, casual, short-term or contracted workers) and to your supply chain to the extent that they undertake work on ADCO projects.

The purpose of this Code is to:

- a. Ensure that our Trade Partners adhere to the highest ethical standards; and
- b. Clearly outline the minimum standards for doing business with ADCO.

As a Trade Partner you must familiarise yourself with this Code and ensure that your conduct and the conduct of your personnel is at all times consistent with this Code.

## Law and Ethical Standards

As a Trade Partner you must:

- a. Comply with all laws applicable to your business;
- b. Act ethically at all times, and not engage in any improper tendering practices including, for example, collusive tendering or coercion, or in misleading or deceptive conduct;
- c. Perform all work with due care and diligence;
- d. Immediately report any suspicions of fraudulent, coercive, or other improper behaviour to ADCO; and
- e. Use reasonable endeavours to ensure that your supply chain acts consistently with this Code.

## Work Health and Safety

The health, safety and well-being of people employed at work, or people affected by our work, is paramount when work is being performed either by ADCO or on our behalf.

As a Trade Partner, you must ensure health and safety is maintained by:

- a. Complying with all applicable health and safety laws, regulations and applicable codes and standards to ensure a healthy and safe work environment, the well-being of employees, and to prevent incidents of injury, near miss and work-related illness;
- b. Complying with the ADCO Health Safety Environment (HSE) Requirements provided at Tender, our HSE Management System and any other requirements notified by ADCO which are relevant to the work you undertake; and
- c. Immediately notifying ADCO of any health and safety hazards or environment impacts, incidents of work-related injury or illness and co-operating with ADCO in providing all relevant information.

## Sustainable development

Consistent with our Environmental Social Governance Policy and our ESG Strategic Framework to promote Sustainable Development, we require Trade Partner support, participation, and innovation to drive procurement strategies and material selection that support sustainable development design initiatives, reduced emissions and reduced depletion of natural resources across our projects. This includes:

- a. The procurement and use of products, materials and processes that support the circular economy;
- b. Protection of the natural environment and biodiversity;
- c. Procurement practices that support social enterprises, local suppliers and supplier diversity;
- d. Waste avoidance strategies;
- b. Procurement and use of products, materials or processes that support reduced Green House Gas emissions; and
- c. Engagement in the emerging transition of key materials to low embodied carbon alternatives.
- d. Reporting on emissions data to assist ADCO in its disclosure of climate-related financial information.

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## Modern Slavery

ADCO recognises the definition of Modern Slavery provided in the Modern Slavery Act 2018 (Cth), which includes:

- Slavery;
- Servitude;
- Forced labour;
- Deceptive recruiting;
- Forced marriage;
- Debt bondage;
- Trafficking in persons; and
- The worst forms of child labour.

ADCO is committed to identifying and remediating Modern Slavery practices in its operations and supply chain. As a Trade Partner, you commit to observing and complying with ADCO's Modern Slavery Policy, utilising appropriate labour practices, and mitigating, remediating and reducing Modern Slavery risks identified in your supply chain.

## Compensation and working hours

- ADCO supports a culture of respect for workers through robust human resources systems, including new employee on-boarding and induction, and regular reviews of employment agreements, salary arrangements and workplace policies.
- As a Trade Partner you must comply with all applicable national laws and mandatory industry standards regarding working hours, overtime, wages and benefits. You must pay workers in a timely manner and clearly convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure must not be allowed if not legally permitted and, even where legally permitted, should be minimised.
- ADCO complies with the Workplace Gender Equality Act (Cth) 2012, promotes and actively encourages gender pay equity and conducts annual gender pay gap analyses. ADCO encourages gender pay equality for all Trade Partners and their supply chains.

## Freedom of Association

ADCO recognises that all employees and contractors have the right to join or not join a building association, whether a Union or employer body. This is called freedom of association.

ADCO respects the right to freedom of association under the law and we require our Trade Partners to observe the same standard.

## Promoting a safe, healthy and inclusive workplace

ADCO is committed to providing a safe, healthy and inclusive work environment free from any form of discrimination, harassment, sexual harassment, gender-based harassment, bullying, victimisation, vilification or violence across all its business undertakings, including work related to operations or events, and across electronic or other communications media. ADCO recognises and is committed to meeting its obligations under laws related to health and safety, sexual harassment, other forms of harassment, bullying, discrimination, human rights, equal opportunity and racial vilification.

As a Trade Partner, you must not engage in any form of discrimination, harassment, sexual harassment, gender-based harassment, bullying, victimisation, vilification or violence of any kind, or any other conduct that is inconsistent with maintaining an inclusive and diverse workplace and you commit to complying with ADCO's Discrimination, Harassment and Bullying Prevention Policy.

Conduct that is inconsistent with ADCO's policies and expectations will be subject to management action which may include disciplinary action or termination of engagement and reporting of unlawful behaviour or conduct to the relevant authorities.

In addition, you must not carry out, participate in, or promote acts that could threaten the social cohesion of the workforce and increase the risk of violence.

## Privacy and confidentiality

ADCO respects the privacy of individuals' personal information and is committed to ensuring that it complies with the Australian Privacy Principles as specified in the Privacy Act 1988 (Cth).

As a Trade Partner, you must comply with all applicable laws regarding the protection of the personal data of customers, consumers, employees and shareholders, when such data is collected, processed, transmitted, used or retained. You must safeguard and make appropriate use of confidential information. You must not disclose any information that is not known to the general public.

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## Conflicts of Interest

ADCO aims to ensure that its workers, supervisors, managers and directors are aware of their obligations to identify and disclose any conflicts of interest and to ensure that those conflicts are appropriately managed. You must similarly comply, disclosing any actual or potential conflict of interest with ADCO personnel.

Conflict of interest situations may include a family relationship, partnership, business relationship, business partnership or investment.

## Anti-Corruption

As a Trade Partner you must:

- a. Comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards;
- b. 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;
- c. Comply with applicable laws and regulations designed to combat money laundering activities and maintain financial records and reports according to international laws and regulations; and
- d. Take reasonable steps to ensure you have appropriate policies and safeguards in place to prevent corruption, bribery or anti-competitive behaviour.

## Business continuity

As a Trade Partner, you must be prepared for any disruptions to your business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases, worker shortages). This preparedness especially includes business continuity and disaster recovery plans to protect both employees and the environment, as far as possible, from the effects of possible disasters that arise within the scope of your operations.

## Reporting

Any employee or other worker who believes they have been subjected to any conduct inconsistent with this Supplier Code of Conduct, should report it immediately to an ADCO workplace representative verbally or in writing. A number of reporting options are available to employees of Trade Partners including:

- notification to an ADCO Connector identified at a specific workplace; or
- completion of a Notification of An Issue form available at ADCO projects and provide the completed form to an ADCO workplace representative or anonymously via the project site mailbox.

## Our contact

As a Trade Partner, you are essential to us achieving our commitment to integrity and maintaining the highest ethical standards.

Thank you for your support of this Code. If you have any queries about the Code or wish to raise any issues of concern, please contact our State Manager, whose details are available on our website:

[adcoconstruct.com.au](http://adcoconstruct.com.au).

A handwritten signature in blue ink, appearing to read 'Neil Harding'.

**Neil Harding**  
Managing Director