

## SUPPLIER CODE OF CONDUCT

FDC support the United Nations Global Compact and are committed to responsible business practices in all our markets. We are committed to aligning our operations and strategies with the UN Global Compact's ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption.

This commitment guides how we conduct our own operations and the way we interact with our customers, suppliers and other stakeholders. FDC views its suppliers as partners and cares about the way they do business. The Supplier Code of Conduct (Code) describes FDC's minimum standards in the areas of labour and human rights, health and safety, environment, ethical dealings and supply chain diversity.

FDC suppliers are advised to review this Code and ensure that relevant areas of their business and supply chain meet these standards. Because we stand for more than short term gains, FDC will work with its suppliers to go beyond legal compliance, exceed minimum requirements and continuously improve. By supplier, FDC means any entity that supplies goods or services to the FDC Group or its related companies anywhere in the world.

Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the supplier and of its related entities. FDC will formally incorporate the Code into its procurement contracts with suppliers. A supplier's ability to meet or exceed standards detailed in this Code will be taken into account by FDC when making procurement decisions and throughout the management of existing and new contracts. This will happen regardless of whether or not the Code has been formally incorporated into a particular contract.

Where FDC procurement contracts set out more specific social, environmental and / or ethical requirements, the Code supplements those provisions. FDC expects suppliers to communicate the Code to related entities, suppliers and subcontractors who support them in supplying to FDC, so that they are aware of, understand and comply with the Code.

Internationally recognised standards, to assist suppliers understand the requirements of the Code, and guidance on how to demonstrate compliance is provided in the Supplier Code of Conduct - Resources and References. Fundamental to this Code is a requirement that all suppliers, in all of their activities, operate in full compliance with all laws, rules and regulations of the countries in which they operate.

### LABOUR AND HUMAN RIGHTS

Suppliers must respect and support the protection of internationally proclaimed human rights. This applies to workers as well as individuals and communities affected by the activities of the supplier. Non-discrimination Suppliers must not engage in or support discrimination in hiring and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, personal association or other grounds mentioned in relevant legislation.

#### Disciplinary Practices

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse and harsh or inhumane treatment is prohibited.

#### Freedom of Association

Suppliers must respect workers' freedom of association and recognise their right to collective bargaining and to form and join workers' organisations. Suppliers must protect against acts of interference with the establishment, function or administration of workers' organisations in accordance with applicable laws and regulations.

### **Working Hours**

Suppliers must not require workers to exceed prevailing local work hours.

Suppliers must use International Labour Organisation standards on working time as the basis for regulated hours of work, daily and weekly rest periods and annual holidays. By way of guidance, SA 8000 states that the normal work week, not including overtime, is defined by law but will not exceed 48 hours. It also provides that workers must be allowed 1 day off following every 6 consecutive work days (except in emergency or unusual situations) and that overtime is voluntary, should not exceed 12 hours per week, and should not be required on a regular basis.

### **Wages and Benefits**

Suppliers must comply with all applicable laws and regulations relating to wages and benefits, including those relating to minimum wages, payment for overtime, piece rates and other elements of compensation, and provide legally mandated benefits. Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner.

### **Forced and Compulsory Labour**

Suppliers must not use forced or involuntary labour.

Labour should be freely given and employees should be free to leave in accordance with established rules. By way of guidance, the UN Global Compact defines forced and compulsory labour as any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced or compulsory.

Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment.

### **Child and Underage Labour**

Child labour is strictly prohibited. The minimum age for employment or work is the higher of: 15 years of age, the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country. The Code does not prohibit participation in workplace apprenticeship programs or light work as defined by International Labour Organisation standards.

## **MODERN SLAVERY**

FDC Construction and Fitout Pty Ltd (FDC) and its reporting entities are committed to working towards the elimination of all forms of Modern Slavery within our own businesses and those of our partners and suppliers and their supply chains.

FDC have committed to abide by the mandatory requirements (as a minimum) of the Modern Slavery Act 2018 (Commonwealth) (Act), including the provision of an annual "Modern Slavery Statement" and requires that all of its eligible suppliers (as defined by the "Act") do the same. Voluntary compliance of the Act, by those not captured by the terms of the "Act", is highly encouraged.

Failure to comply with this requirement will be taken into account in our procurement selection process and may be used as a condition of termination of engagement.

The full copy of the FDC Modern Slavery Policy is available on request and a copy of our Modern Slavery Statement will be posted on the designated Department of Home Affairs website, as required by the legislation, as available.

FDC are committed to the continual improvement and review of our processes regarding this issue and to working with our partners and suppliers to continually improve and review theirs.

## HEALTH AND SAFETY

Suppliers must take all reasonable steps to minimise the risk of workplace injury and disease for all workers. This requirement extends to the provision of a healthy, safe and sanitary workplace. Suppliers must ensure that workers have access to potable water, sanitary facilities, adequate lighting and ventilation. Suppliers must ensure these same standards apply to any dormitory or canteen facilities provided for workers and that reasonable permission to enter and exit these facilities is provided. Suppliers must identify, eliminate and where not possible to eliminate, manage health and safety risks which may be present as a result of their activities.

In doing so, the supplier must consider their workers, FDC workers, customers and members of the community that have the potential to be impacted by the identified risks. Suppliers must engage their workers in consultative and cooperative arrangements to assist in the management of workplace health and safety risks, and maintain an environment that encourages workers to raise legitimate health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.

Suppliers must identify and comply with all relevant workplace and product health and safety laws, and ensure that workers are informed of any specific legal obligations that apply to them in carrying out their work. When designing products, buildings, equipment, etc, safety considerations must be taken into account at each stage of the lifecycle. This includes; design, prototyping, production, construction, use, and disposal, decommissioning and demolition.

Suppliers must ensure that products meet relevant standards and legislative requirements and provide FDC with information relating to any risks that are associated with the product and its use. Plant, equipment or machinery must be appropriately maintained and workers must be provided with appropriate information, instruction and training to ensure its safe use.

Suppliers must provide workers with appropriate safety equipment including personal protective equipment (PPE) that is maintained in accordance with relevant standards and manufacturers' requirements. Workers must be provided with information, instruction and training in the safe use of safety equipment such as PPE prior to use.

### **Incident and Emergency Management**

Suppliers must identify incident and emergency situations that have the potential to impact their workers or third parties, and ensure that appropriate response procedures and preventative measures are established and implemented.

Suppliers must ensure that their workers are trained in established response procedures (including the completion of appropriate drills) and are provided with processes to report incidents and emergencies should they occur.

For locations under their control, suppliers must ensure that appropriate emergency equipment is available and that workers are provided with appropriate instruction in how to operate the equipment in the event of an incident or emergency (for example; fire extinguishers, first aid kits, spill kits, etc). In the event of an incident or emergency, suppliers must ensure that they provide appropriate assistance (including medical attention where required) to affected parties.

## ENVIRONMENTAL CONSIDERATIONS

Suppliers must adopt a precautionary approach to environmental challenges. At a minimum, suppliers must comply with all applicable environmental laws, regulations, standards and International treaty obligations, including but not limited to those relating to the collection, handling, storage, transport and treatment of dangerous goods, controlled substances and hazardous wastes; wastewater; and environmental permits and reporting. Suppliers are expected to identify and implement opportunities to minimise the environmental

impacts of their operations, as well as their products and services, and demonstrate continuous improvement in environmental performance.

### **Resource Efficiency**

FDC supports application of the waste hierarchy, an internationally recognised best practice approach to waste management. It is focussed on avoidance of waste first followed by designing products for easy reuse and or the recycling of component materials. The use of shared, re-used and recycled content is also encouraged, as are any practices that contribute to the circular use of resources. FDC is a signatory to the Australian Packaging Covenant (APC) and expects suppliers to demonstrate a similar commitment to minimising the adverse environmental impacts of their packaging. Suppliers should aim to use packaging which can be recycled and use logos to communicate how packaging should be disposed of.

FDC prefers suppliers who use rigorous forest product certification schemes such as the Forest Stewardship Council (FSC) certification scheme to encourage the use of sustainable timber and timber based products (including paper). Where FSC certified products cannot be supplied, FDC expects suppliers to use products whose origin and legality can be independently verified in other ways.

### **Carbon & Energy Use**

Suppliers must seek to reduce carbon dioxide equivalent emissions (CO<sub>2</sub>e) through the supply of resource and energy efficient alternatives which reduce energy consumption and costs.

FDC prefers suppliers who provide products rated in accordance with recognised standards such as EPEAT™ and ENERGY STAR. Suppliers undertaking energy intensive activities such as manufacturing, processing or mining must do so in a way that maximises efficiencies and minimises emissions.

### **Pollution Prevention**

Suppliers must keep records of and monitor, control and treat potential pollutants appropriately. This includes: waste water, solid waste and harmful air emissions such as Volatile Organic Compounds, chemicals with ozone depleting potential, particulates and combustion by-products. FDC encourages suppliers to use low emission equipment and plant. Suppliers must optimise transport efficiency and minimise transport distances.

If applicable, suppliers must keep records of substances listed on the Joint Industry Guidelines (JIG) Declarable Substances List used for materials and products, including packaging, supplied to FDC. Suppliers must, as far as possible, minimise the concentrations of Brominated Flame Retardants and heavy metals in products and packaging. Polyvinyl chloride (PVC) should be avoided.

## **ETHICAL DEALINGS**

Suppliers must be trustworthy in all their dealings with others and conduct themselves in ways that are competitive, fair and honest.

### **Business Integrity**

Suppliers must comply with all applicable anti-bribery, anticorruption and anti-money laundering laws and regulations, and have adequate policies and procedures in place to ensure and monitor compliance with such laws and regulations. FDC prohibits bribes, pay-offs, secret, unjustified or inflated commissions, kick backs or any like payments. This includes facilitation payments which are payments made to officials to expedite or secure routine government actions.

Suppliers must not offer, make, authorise or accept payment of money or anything of value, either directly or through a third party, to any person (including any government official) to: improperly influence the judgement or conduct of a customer, supplier or competitor; improperly influence a decision of, or gain a

benefit from, any government official, government agency, political party or candidate for political office; gain an improper advantage or induce a person to act illegally or dishonestly to corrupt the decision making process; or reward improper performance.

## **Privacy**

FDC's Privacy Policy outlines obligations to protect the reasonable privacy expectations of personal information of everyone we do business with, including our suppliers, customers, consumers and workers. Suppliers must comply with FDC policies, including privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **Ethical Sourcing of Materials**

Suppliers are expected to exercise due diligence with regards to the ethical sourcing and chain of custody of components and raw materials used in the goods they supply.

This includes resources such as tantalum, tin, gold, or tungsten, commonly used in production of electronic equipment, that could have been used to finance or benefit, either directly or indirectly, armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. Direct or indirect support of organisations and individuals associated with illegal activities such as human rights abuses, terrorism, modern slavery amongst others, must be avoided.

## **Complaints**

Suppliers must provide a formal complaints management process for customers, suppliers, workers and members of the community in which they operate or provide services. The process must seek to ensure confidentiality of complainants and prohibit retaliation against anyone who, in good faith, participates in the process.

## **DIVERSITY**

FDC is committed to being a diverse and inclusive employer and achieving greater diversity in our supply chain. At FDC, diversity and inclusion relates to differences in gender, age, race, religion, disability, sexual orientation and cultural background. FDC prefers suppliers who share our vision for more gender balanced teams and strong female gender representation, including at the senior leadership level.

FDC seeks to partner with organisations that can demonstrate progress to improve gender equality at all levels, who actively promote women and work to address gender pay equity gaps and over-representation of women in departures. FDC is also a member of Supply Nation, an organisation that helps connect Australian corporate and government organisations with indigenous suppliers, and prefers suppliers who engage with social enterprises and minority-owned organisations in the delivery of goods and services. FDC's Supported Workforce Program is an initiative that creates employment opportunities for people with disability or who are disadvantaged.

FDC looks favourably on suppliers that initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged.

## **EFFECTIVE MANAGEMENT**

Suppliers should develop, maintain and implement policies consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with the Code. FDC has provided examples of the types of processes, systems and or information that suppliers may wish to maintain and or provide in order to demonstrate: compliance with applicable laws, regulations and customer requirements related to the suppliers operations and products; conformance with the requirements of the Code; and identification and mitigation of operational risks related to this Code.

Suppliers should satisfy themselves that documentation which is appropriate to the scope and scale of their business is available to be provided to FDC upon reasonable request. Small to medium sized enterprises that

supply products or services that are low risk from a sustainability perspective may be exempted from certain sections of the Code.

## ENFORCEMENT PROVISIONS

FDC may at any time require a supplier to complete, fully and accurately to the best of its knowledge, a Self Assessment Questionnaire in a form determined by FDC. If a supplier is unable to demonstrate compliance with this Code, the supplier may be required to take other steps to satisfy FDC that it intends to act to comply. This may include the submission of an Improvement Plan in a format provided by FDC or another acceptable format. If a supplier becomes aware of a reasonable risk that it is in breach of this Code, the supplier must notify FDC as soon as possible.

FDC may at any time require the supplier to prepare a Management Plan describing how the supplier will seek to manage identified risks to ensure its compliance with this Code or any part of it. FDC may at any time audit the supplier for compliance with this Code, in which event the supplier should cooperate by providing such information, documents and access to staff, as FDC reasonably requires.

Where FDC has reasonable grounds to suspect a breach of this Code by a supplier, or is otherwise concerned about a supplier's practices in one or more of the areas covered by the Code, FDC may require the supplier to take such additional steps to address such concerns. This could include: the provision of additional information or, in more serious cases, other steps including submission to an independent audit at the supplier's premises and at the supplier's cost.

### Continuous Improvement

FDC will actively support suppliers in the establishment of better practices in order to meet and exceed the standards outlined in this Code. This may be provided as informal advice, as templates and reference material or via supplier workshops focussed on specific issues of concern to FDC. This Code is subject to ongoing review and revision. FDC welcomes feedback from suppliers on the Code and how it is operating in practice. The latest version of the Code is available by contacting [enq@fdcbuilding.com.au](mailto:enq@fdcbuilding.com.au).

A handwritten signature in black ink, appearing to read 'R. Grady', is positioned above the name of the signatory.

Russell Grady  
Managing Director