

SUPPLIER CODE OF CONDUCT

Overview

At AVJennings, we are committed to integrity and ethical actions in all our business dealings. This commitment extends to our relationships, both within AVJennings and externally to our suppliers, clients, contractors and other parties with whom we deal. We view our suppliers as our partners in business and are committed to open and transparent relationships with all those who provide goods or services to us, including consultancy, civil works, construction and all associated services and trades.

This Supplier Code of Conduct ("Code") sets out our commitment to ethical, sustainable and socially responsible procurement and our expectations of our suppliers in the areas of:

1. Labour and Human Rights
2. Workplace Health and Safety
3. Governance
4. Ethical Behaviour and Conflicts of Interest and
5. Environmental Sustainability.

Scope

This Supplier Code of Conduct applies to all suppliers of goods and services to AVJennings, whether state based, national or international. The expectations outlined in this Code are not intended to supersede or alter a supplier's regulatory or contractual obligations. Suppliers should check their respective contracts, agreements or purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

Definitions

Suppliers means organisations or persons that are under a contract (via a purchase order, specialist service or consultancy agreement, supply agreement, civil, design or construction contract) to provide goods and services to AVJennings.

Where the code refers to workers, it includes employees, contractors, agency and temporary staff of the supplier and its related entities.

Where the code refers to the law, it means laws in the jurisdiction that apply where the goods are procured or services are performed.

Supplier Requirements

1. Labour and Human Rights

At AVJennings, we believe that all workers in our supply chains deserve to be treated with dignity and respect. We expect our suppliers to provide ethical employment by supporting the rights of their employees and creating fair, inclusive and safe work workplaces.

1.1 Wages and Working Hours

Suppliers must:

- Pay all workers at least the minimum legal wage or a wage that meets local industry standards.
- Ensure working hours are reasonable, that workers receive legally mandated leave entitlements, holidays, superannuation and other legally mandated benefits including overtime payments in accordance with applicable laws.
- Pay wages in a timely manner.
- Not use wage deductions as a disciplinary measure or make deductions from wages not provided by applicable legislation or other legal requirement, without the consent of the worker concerned.
- Provide all workers with written and understandable information about their employment conditions and particulars of their wages for the pay period each time they are paid.

1.2 Involuntary or Under Age Labour

Suppliers must:

- Make necessary enquiries to ensure no forced or bonded labour is used in their business or supply chains.
- Only engage workers who are above the applicable minimum legal age.
- Ensure any identified forced or child labour impacts are immediately remediated in line with accepted good practice.

1.3 Freedom of Association

Suppliers must:

- Allow workers to freely associate with others and to form or join (or refrain from joining) industrial organisations or associations of their choice, including for the purposes of collective bargaining or industrial activity, without discrimination, retaliation or harassment.
- Worker representatives are not discriminated against and are able to carry out their representative functions in the workplace without hinderance.

1.4 Use of Temporary and Outsourced Labour

Suppliers must:

- Establish systems to monitor any third-party labour providers or labour sourcing agents it uses, to ensure their workers are lawfully engaged in line with applicable Workplace Laws and the provisions of this Code.
- Ensure third party labour providers are able to demonstrate their workers have adequate right to work documents, employment contracts and payslips and access to grievance mechanisms.

2. Workplace Health and Safety

2.1 Health and Safety Management

Suppliers must:

- Comply with AVJennings safety management systems and duties as a “Worker”. Undertake site specific induction, where applicable.

- Ensure workers are provided with a safe and healthy working environment, in line with applicable laws relating to workplace health and safety.
- Ensure their workers receive adequate on-the job training to safely carry out their roles.
- Implement adequate systems to manage workplace health and safety hazards, including those which are specific to the type of activity being undertaken and where it is being performed.
- Consult with workers in relation to workplace health and safety risks and provide further information and training as required.
- Maintain appropriate policies, standards, systems and procedures to prevent workplace accidents and illnesses and maintain adequate records documenting workplace incidents and remedial actions taken.

2.2 Anti-Discrimination and Harassment

Suppliers must:

- Not discriminate against any worker based on age, race, religion, gender identity, citizenship or marital status, sexual orientation, disability, union membership or any other legally protected status in all hiring and employment practices.
- Commit to a work environment free from bullying, harassment, intimidation, victimisation or abuse. This includes verbal, physical, sexual or psychological abuse. Suppliers are expected not to bully or threaten workers or subject them to unlawful or inhumane treatment.

3. Governance

Suppliers must:

- Comply with relevant legal, regulatory and industry standards in all areas of their business, including labour standards, modern slavery laws, workplace health and safety, anti-bribery, anti-corruption and environmental management that are applicable in the jurisdictions in which they operate.
- Implement and maintain policies and management systems that support such compliance.
- Develop and maintain processes to identify, manage and control risks in their supply chain relating to labour and human rights, modern slavery, health and safety.
- Have in place appropriate mechanisms for reporting of grievances that facilitate open communication between management and employees.
- Conduct themselves and their business in a manner that is fair and professional and will not bring AVJennings into disrepute.
- Maintain confidentiality and not improperly use any private or commercially sensitive information that may come into their possession in relation their dealings with AVJennings or its customers.

4. Ethical Behaviour and Conflicts of Interest

- AVJennings expects its suppliers to be ethical in their business activities and to not engage, either directly or indirectly, in fraudulent, corrupt, exploitative or collusive activities.

- Suppliers are expected to conduct all business activities with AVJennings impartially and to raise any actual, potential or perceived conflicts of interests with AVJennings' Management, so they can be managed appropriately.
- AVJennings' Code of Conduct for employees and Fraud and Corruption prevention policies prohibit its employees giving or accepting bribes or similar considerations and engaging in activities that could interfere with their ability to make free and independent decisions regarding purchase and procurement on behalf of AVJennings. Suppliers are therefore expected to not take any action to entice or obtain an unfair or improper advantage in securing and retaining business from AVJennings. Such actions could result in termination of the affected employee's employment with AVJennings and repudiation of the supplier's contract, including legal action against the supplier.
- AVJennings' Code of Conduct for employees also prohibits the acceptance of gifts, hospitality and donations. Suppliers are expected not to offer AVJennings employees excessive gifts or benefits either directly or indirectly that may create a potential or perceived conflict of interest.

5. Environmental Sustainability

Suppliers must:

- Comply with all applicable legislative and regulatory requirements relating to environmental protection.
- Develop policies and procedures to appropriately minimise environmental impact associated with their business and their supply chains.
- Implement strategies for the efficient use of energy, water and natural resource consumption and reduction of waste.
- Ensure safe storage, transportation and disposal of hazardous substances including hazardous waste.
- Large civil construction projects to have Site Safety Management Plans (including the management of environmental hazards).

6. Assessment and Corrective Action

Suppliers are expected to assess their compliance with this Code and take timely action to correct any deficiencies or breaches identified by that assessment. They are encouraged to seek clarification as to any elements of this Code or raise any concerns they may have with AVJennings. When requested, suppliers must provide evidence and confirm their compliance with this Code, which may include provision of documents and records supporting compliance, or completion of pre-qualification checks and questionnaires, including a Modern Slavery Questionnaire.

7. Reporting Concerns

If a supplier considers that it, or another supplier in its supply chain has deviated from or breached their obligations under this Code, they must report their concerns to AVJennings immediately via any one of the following channels :

- To the site supervisor or procurements officer they deal with in the ordinary course of business, who will then escalate it within the AVJennings business
- Via the Company's Whistleblower channels, either anonymously or otherwise:
 1. Carl Thompson, General Counsel & Company Secretary
Phone: 03 8888 4802; Email: cthompson@avjennings.com.au
 2. Lisa Hunt, General Manager, Human Resources
Phone: 07 3149 8004; Email: lhunt@avjennings.com.au
 3. Richard Thomas, Internal Audit Manager
Phone: 02 9846 6564; Email: rthomas@avjennings.com.au
 4. By Post to the General Counsel & Company Secretary c/- Level 4,
108 Power Street, Hawthorn Vic 3122 (marked Private & Confidential)
 5. Website link: www.avjennings.com.au/about us/ Whistleblower-Form