

Vendor Code of Conduct



building the
imagine nation

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1 Introduction – Why This Matters

At Mirvac, we believe strong, respectful partnerships help us create places where people and communities thrive. This Vendor Code of Conduct (VCoC) sets out what we ask of the people and organisations we work with, from large corporates to family-owned businesses – to ensure our supply chain is safe, ethical, and responsible.

We understand that suppliers vary in size, capability, and maturity. While this document reflects the standards we aspire to across our supply chain, we recognise that smaller suppliers may approach these expectations differently. We encourage all partners to align with the intent of this VCoC in ways that are practical and proportionate to their operations.

We know our suppliers play a key role in helping us deliver on our values and commitments. That's why we've written this document in plain terms, to make it clear, practical, and inclusive.

Mirvac is a top 100 company listed on the Australian Securities Exchange (ASX), with more than 50 years of experience shaping Australia's urban landscape. We bring together the full spectrum of asset creation and curation – with a strong focus on placemaking, safety, sustainability, and innovation.

Our purpose, *to reimagine urban life*, inspires us to enhance the experiences of those who live, work, or spend time in and around our places. Our relationships with third-party suppliers, consultants, and contractors (referred to collectively as "suppliers") are built on mutual respect, transparency, and a shared commitment to excellence.

We see our suppliers as key partners in delivering high-quality outcomes for our customers and communities. This VCoC sets out Mirvac's expectations in line with our values and our Environmental, Social and Governance (ESG) strategy, [This Changes Everything](#). Our ESG strategy enables us to be a force for good. It brings together our ambition for regenerative cities, our stakeholders' priorities, and the capabilities of our people.

Suppliers should be aware of, and where possible, align with relevant Mirvac policies and frameworks, including those related to social impact, environmental sustainability and health, safety and environment (HSE) please refer to the [Mirvac.com](https://www.mirvac.com) webpage.

This VCoC outlines our baseline requirements and leadership expectations for suppliers and encourages them to go beyond compliance to help us achieve lasting, positive impact.

2 Scope

This VCoC applies to all third-party providers who supply goods or services to Mirvac – including subcontractors, consultants, joint venture partners and any party acting on behalf of a supplier.

Suppliers are expected to read, understand, and take reasonable steps to align with the principles set out in this Code. This includes promoting these standards within their own supply chains. While we acknowledge different operating contexts and levels of maturity, we expect all suppliers to operate in a way that supports ethical, legal, safe, and sustainable outcomes.

Mirvac may conduct reviews or assessments to monitor compliance with the VCoC, and we expect suppliers to cooperate openly and honestly in this process. In cases where non-compliance is identified, we will work collaboratively to understand the issue and agree on appropriate corrective actions.

When we say "vendor" or "supplier," we mean any organisation or individual that collaborates with us as part of our external supply chain.

In cases where our expectations conflict with local laws, we expect suppliers to follow the higher standard, where it is lawful and practical to do so.

3 Our Values in Action

Our values shape everything we do at Mirvac and this VCoC brings them to life in the way we collaborate with you:

Our Value	What It Means for Suppliers
We put people first	Prioritise health, safety, and wellbeing. Treat everyone with fairness and respect.
We are passionate	Take pride in your work. Help us deliver better outcomes for communities and customers.
We collaborate	Be open, transparent, and work in partnership – not just at contract negotiation/ renewal time.
We are curious	Look for new ways to improve. Share ideas and innovations that lift us all.
How we work matters	Act with care and consistency. Respect our processes, policies, and the trust placed in you.
We are genuine and do the right thing	Demonstrate integrity in every action. Speak up when something is not right.

4 People, Safety & Human Rights

We expect our suppliers to uphold and protect the fundamental rights, safety, and dignity of all people involved in their operations and supply chains, whether directly employed or subcontracted.

At a minimum:

- Provide a safe and healthy working environment.
- Comply with health and safety laws, [Mirvac's HSE Minimum Requirements](#) and incident reporting requirements.
- Ensure all workers are legally entitled to work.
- Never use forced, bonded, or child labour.
- Treat all workers fairly: provide fair/compliant wages, reasonable hours, and lawful contracts.
- Foster an inclusive workplace free from bullying, harassment, and discrimination.
- Respect freedom of association and collective bargaining.

- Commit to providing a workplace free from discrimination, bullying, and harassment; promote respectful language and behaviours when interacting with Mirvac employees; prohibit all forms of modern slavery in alignment with Mirvac's [Modern Slavery Statement](#); comply with international human rights laws, including the UN Guiding Principles on Business and Human Rights and the ILO's core conventions; and understand and support the intent of [Mirvac's Inclusion Policy](#).

To show leadership:

- Work with Mirvac to improve transparency in your supply chain, including by providing information on sourcing practices, labour conditions and the use of subcontractors when requested.
- Proactively identify and assess risks such as modern slavery or unsafe working conditions within your operations and supply chain, and collaborate with Mirvac to put appropriate controls, remediation measures, and/ or continuous improvement plans in place.

5 Governance & Cybersecurity

We expect suppliers to actively manage risks – including environmental, social, governance, and cybersecurity risks, in a way that suits the size and nature of their business.

At a minimum and as appropriate to your business or organisation:

- Assign oversight of all risks, including cybersecurity, to your senior leaders (e.g., Directors or senior executives).
- Protect the confidentiality, integrity, and availability of sensitive and personal information from misuse, loss, or breaches.
- Inform Mirvac promptly of any data incidents affecting us and to ensure timely communication and effective response.

To show leadership:

- Develop a sustainability and cybersecurity strategy with clear objectives and regular reporting.
- Include sustainability and cybersecurity targets in leadership KPIs and remuneration.
- Influence your own suppliers to uphold these expectations.
- Operate your own grievance mechanism and promote Mirvac's whistleblower service.

6 Environment

The property industry relies on natural resources, and we all share a responsibility to use them wisely.

At a minimum:

- Comply with environmental laws and Mirvac's advised requirements.
- Have an environmental policy or equivalent document.
- Manage environmental risks through a fit-for-purpose system.

To show leadership:

- Set targets to reduce waste, emissions, and energy use.
- Use recycled materials and reduce reliance on virgin resources.
- Educate your supply chain on reducing environmental impacts.
- Measure and plan to reduce Scope 1, 2, and 3 carbon emissions.

7 Diversity, Inclusion & Community

We want to collaborate with suppliers who reflect the communities we serve and who care about their local impact.

At a minimum:

- Respect all individuals - no discrimination, no harassment.
- Take reasonable steps to minimise disruption to local communities.

To show leadership:

- Proactively include diverse suppliers and employees, including First Nations-led and owned businesses, social enterprises and demonstrate inclusive recruitment practices.
- Support social impact goals through RAPs or charity partnerships.
- Take part in community initiatives such as Mirvac's National Community Day.

8 Ethical Business Practices

We expect our suppliers to operate with integrity, comply with the law and be alert to conflicts of interest.

At a minimum:

- Comply with anti-bribery, anti-corruption, anti-money laundering and insider trading laws.
- Have controls in place to prevent fraud or unethical conduct.
- Report any concerns via our [Whistleblower](#) service.
- Treat all interactions in connection with Mirvac, including those with employees, contractors, customers, community members and other stakeholders, with professionalism and respect. This includes the use of courteous and inclusive language. Offensive, aggressive, or otherwise inappropriate behaviour will not be tolerated.

To show leadership:

- Actively raise any concerns, early and constructively.
- Treat your own suppliers fairly, including prompt payment and reasonable terms.
- Make proactive steps to prevent modern slavery, including:
 - Conducting due diligence in your supply chain

- Addressing any identified risks or incidents
- Supporting transparency and continuous improvement in labour practices

9 Self-Reporting & Continuous Improvement

We encourage suppliers to share information that helps us work together to improve, including via self-assessment tools, audits, or disclosure of any significant incidents or allegations.

If you become aware of a breach or risk of breach of this VCoC, please report it to Mirvac at: responsiblesourcing@mirvac.com or Mirvac's [Whistle Blower Line](#)

10 Reporting Misconduct and Concerns

To raise concerns confidentially, please contact our independent whistleblower service:

- Web: www.whistleblowing.com.au
- Phone (Australia): 1300 790 228
- Org ID: MIRVAC

All reports are managed under our Whistleblower Policy and taken seriously.

11 Key References

- Mirvac's [This Changes Everything](#) ESG Strategy
- [Mirvac Vendor Hub](#)
- [Reconciliation Action Plan](#)
- [Mirvac Corporate Governance documents](#) and related policies:
 - [Conflicts of Interest and Related Parties Transactions Policy](#)
 - [Fraud Bribery and Corruption Policy](#)
 - [Privacy Policy](#)
 - [Inclusion Policy](#)
 - [Modern Slavery Statement](#)
 - [Human Rights Commitment](#)
- Mirvac's [Whistleblower Policy](#)

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Owned by: Mirvac Group Procurement

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12 Version History

Version Number	Review Date	Approval Date	Approval Comments
3.0	07 July 2025	25 July 2025	<p>Approved by Sam Apps, Group General Manager Procurement and Workplace:</p> <ul style="list-style-type: none"> • Social Enterprise/Small Business: Clearer language, compliance support, and flexible implementation. • Tone and structure: Written in plain English, with clearer sectioning and guidance for easier navigation. • People and human rights: Stronger emphasis on modern slavery, safe workplaces, and inclusion. • ESG alignment: The updated VCoC reflects our "This Changes Everything" ESG Strategy. • Cybersecurity and risk: Introduces expectations around data protection and governance maturity. • Positive reinforcement: A shift from purely compliance-based language to also encouraging leadership and best practice. • Supplier self-reporting: Clarifies how to raise issues and how we'll work together to continuously improve.