



Mirvac Vendor Code of Conduct

This *Vendor Code of Conduct (VCOC)* aims to encourage, educate, support and, where appropriate, mandate requirements that will assist Mirvac and our Vendors to contribute to sustainable business operations.

The VCOC outlines Mirvac's commitment to and expectations of its Vendors and the production and delivery of all their goods and services.

The VCOC applies to all Vendors employed across all areas of Mirvac's operations. Vendors who engage sub-contractors, on Mirvac jobs, are encouraged to share the VCOC principles with them.

Mirvac's responsibility is to ensure:

- Promotion of fair and open competition;
- Elimination of fraud and collusion;
- Responsible sourcing activities;
- Equitable treatment of Vendors in accordance with laws, regulations and standards empowered to regulate the industries in which it operates; and
- Consideration of sourcing solutions impacts on the environment, the community and Mirvac's triple bottom line responsibilities.

Definitions

- *Vendor*: refers to all suppliers and subcontractors (supply chain) engaged by Mirvac
- *Workplace Participant*: refers to non-executive Directors, employees and consultants of Mirvac
- *Areas of operation*: refers to both geographic and sector based as deemed appropriate by the Vendor.

Corporate Responsibility & Governance

- The Vendor shall comply with all local and national laws and regulations in the areas in which they operate with regard to bribery, corruption, anti-money laundering, counter terrorism, responsible financing and prohibited business practices.
- The Vendor shall provide a formal complaints management process aligning with the Standards of Australia for employees, their own supply chain and members of the communities in the areas in which they operate or provide services to.
- The Vendor shall ensure all workers are aware of Mirvac's Open Line Policy to register any concerns around processes or procedures they have encountered working with Mirvac. The Open Line Policy provides the option of reporting anonymously or named, and ensures an objective, confidential and independent reporting and investigation process overseen by the Open Line Committee. Details can be found here: www.mirvac.com/About/Corporate-Governance/
- The Vendor shall advise Mirvac Group Procurement of any relationship with the potential Vendor that could be seen as a conflict of interest. A conflict of interest may arise if a Vendor or their family member has a close relationship with a Workplace Participant of Mirvac in a decision making role with responsibility around Vendor engagement.

- The Vendor shall have effective and transparent allocation of responsibilities between Board and management, where an applicable organisational structure exists.
- Vendors shall not offer Workplace Participants gifts or entertainment as an inducement for securing sourcing solutions.

People

- The Vendor shall comply with all relevant local and national laws and regulations in the areas in which they operate with regard to:
 - Employment practices;
 - Benefits;
 - Health & safety; and
 - Anti-discrimination.
- The Vendor shall have written labour/workplace management policies and standards.
- The Vendor shall strive to provide a workplace free of direct or indirect discrimination, including but not limited to harassment or bullying on the grounds of: gender, age, race, nationality or ethnic origin, disability, family responsibilities or parental status, marital status, the occupation of spouse or partner, medical, irrelevant criminal record, political convictions, pregnancy or potential pregnancy, religious beliefs or activities, sexual preference or sexuality, industrial activity or union membership, physical appearance or carer's responsibilities i.e. a Diverse workplace.
- The Vendor shall not use child, forced or involuntary labour in any form.
- The Vendor shall be committed to the provision of training and development for all employees.
- The Vendor shall provide fair pay and working conditions, including adequate rest periods and parental leave, and match prevailing working conditions.

Health & Safety

- The Vendor shall comply with all relevant local and national laws and regulations in the areas in which they operate with regard to occupational health and safety including the provision of health related benefits to employees.
- The Vendor shall have written health and safety policies and standards.

Community

- The Vendor shall strive to contribute to the local communities in which they operate and shall ensure that they have procedures in place to minimise any negative impacts to these communities.
- The Vendor shall use reasonable endeavours to support Mirvac initiatives that engage with key community groups that Mirvac impacts through its operations. This could include taking part in Mirvac's National Community Day, working with our National Charity Partner, or supporting a project's apprenticeship program.

Supply Chain

- The Vendor shall adopt supply chain engagement principles and practices that cover the key themes detailed in this Code of Conduct when dealing with their own key Vendors, such as:
 - Vendors with high spend, strategic alliance or long-term supply of goods/services;
 - Vendors with operations in high risk locations according to Transparency International guidelines (<http://www.transparency.org/country>)
 - Vendors providing high environmental, social or governance risk goods or services, including but not limited to:
 - Workforce provision including security services;
 - Dealing with chemicals or other activities that could result in environmental incidents; and
 - Goods or services with high risk for OH&S incidents.
- The Vendor shall adhere to best practice with their own Vendors, including providing for timely payment and reasonable contractual conditions.

Risk

- Where not required as part of their contractual obligation with Mirvac, the Vendor shall:
 - Strive to have a written business continuity plan (BCP), which seeks to minimise business impacts in the event of major disruption, which is integrated across business units and regularly tested; and
 - Strive to have a written emergency response plan (ERP), to minimise harm to employees, the local community and local environment in the event of a site disaster, which is integrated across business units and regularly tested.

Environment

- The Vendor shall comply with all relevant local and national laws and regulations in which they operate with regard to the following issues, this includes environmental permit and reporting requirements, including but not limited to:
 - Land and water management;
 - Waste and recycling;
 - Handling and disposal of toxic substances;
 - Discharges and emissions;
 - Noise;
 - Transportation of products;
 - Wastes and materials selection;
 - Environmental issues management; and
 - Community consultation.
- The Vendor shall have a written policy environment addressing environmental management.
- The Vendor shall strive to have a written environmental management plan to identify and minimise the risk of significant impacts associated with energy, water and waste impacts.