

Supplier Code of Conduct

This Supplier and subcontractor Code of Conduct sets out the minimum standards that Vaughan Constructions and its subsidiary Vaughan Constructions (QLD), expect of their suppliers and subcontractors.

Vaughan expects its suppliers to comply with social, environmental and ethical standards of behaviour, comply with legislation and meet the required standards of the International Labour Organisation (ILO) and the Australian Human Rights Commission.

Application

This Code of Conduct applies to all entities that supply goods or services to Vaughan Constructions. Vaughan expects all of its Suppliers to ensure;

- a) that they comply with the Code;
- b) that their own supply chain complies with the Code; and
- c) that suitable management systems and processes are implemented to ensure and measure compliance with the Code.

We expect our suppliers to communicate this Code to their related entities, employees, suppliers and subcontractors so that they are aware of, understand and comply with this Code.

Compliance with Law

Suppliers must comply with all local, national and other applicable laws and regulations of the jurisdictions in which they operate. The standards outlined in this Code do not replace or alter any legal or regulatory obligations of Suppliers.

Labour and Human Rights

At Vaughan, we respect our people, clients and stakeholders. Vaughan Constructions is built on the company values of; Respect, Integrity, Teamwork, Efficiency and Safety. We expect our Suppliers to align with these principles.

In particular we expect our suppliers to:

- Human rights: Conduct their activities in a manner that respects human rights;

BUILDING CUSTOMERS FOR LIFE

ESTABLISHED 1955

Vaughan Constructions Pty. Ltd. ABN 26 004 334 543
Website www.vaughans.com.au

Melbourne 880 Lorimer Street PO Box 320 Port Melbourne Victoria 3207 | Phone +61 3 9347 2611 | Facsimile +61 3 9347 6130
Sydney 9A Commercial Rd. Kingsgrove NSW 2208 PO Box 451 Kingsgrove NSW 1480 | Phone +61 2 9502 4544 | Facsimile +61 2 9502 4463

- Wages: Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers. Pay their workers equal pay for equal work;
- No forced labour: Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers;
- No child labour: Comply with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction or the standards set by the International Labour Organisation, whichever is higher. Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development;
- Working conditions: Provide fair working conditions for their employees;
- Working hours: Maintain working hours that are reasonable and not excessive;
- Safe environment: Promote and maintain a workplace that is free from violence, threats of violence, bullying, harassment, discrimination, inhumane treatment or abuse;
- Health and safety: Promote a working environment that protects workers' health and wellbeing as well as ensuring there are safe work practices;
- No discrimination: Seek to eliminate discrimination including on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, legal status or social origin and promote equality of opportunity and treatment; and
- Associations: Respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

Health and Safety

At Vaughan, we are committed to providing a healthy and safe workplace for all people involved in our business operations.

We fulfil this commitment by achieving compliance with all applicable work health and safety legislation, industry standards, and best practice in the management of health and safety issues affecting the workplace, as well as being FSC accredited and AS4801 certified.

We expect our suppliers to operate with the level of care and commitment towards the health and safety of the people operating in both their own, and Vaughans workplaces. Suppliers must identify and comply with relevant workplace, and product health and safety, laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work and industry.

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In particular we expect our suppliers to:

- Comply with all relevant national and local health and safety legislation including health and safety management and reporting;
- Take reasonable steps to actively identify and manage workplace health and safety risks, through the identification of hazards, evaluation of their risks and implementation of effective risk controls;
- Provide appropriate training, education and resources to all employees to enable them to carry out their duties safely and assist them in understanding their roles and responsibilities in relation to workplace health and safety; and
- Building and maintaining a culture that encourages employees to actively participate in health and safety initiatives and supports workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.

Environmental Considerations

At Vaughan, we take our responsibility to care for and protect the environment seriously. We aim to minimise the environmental impacts of our operations, products and services and expect our Suppliers to do the same.

We expect Suppliers to demonstrate that they:

- Adopt environmental standards that meet or exceed applicable legislative and regulatory requirements and relevant standards or codes of practice;
- Implement environmental management processes that identify, control and where possible reduce environmental impact and continually assess the environmental impacts of their operations;
- Minimise waste through efficient use of materials and in particular,
 - maximise recyclable and sustainable materials;
 - minimise the use of energy, water and raw materials where possible;
 - practical efforts should be made at all times to minimise waste and disposable should be done in an environmentally responsible manner;
- Avoid contamination to the local environment and minimise emissions and pollution (air and noise); and
- Set internal improvement targets for environmental performance.

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Ethics, Anti-bribery and Corruption

Vaughan demonstrates clear ethical standards and behaviour throughout the organisation through compliance to our policies, procedures and values. Vaughan expects the same standards of behaviour from its Suppliers.

All Suppliers must have appropriate policies and procedures in place in relation to money laundering, insider trading, conflicts of interest, fraud, bribery and corruption as well as the improper payments and/or gifts.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws.

Privacy

Vaughan is bound by the Australian Privacy Principles contained in the Privacy Act. We expect our Suppliers to have adequate data privacy and security protection to protect against the unauthorised access, use and disclosure of personal information.

Conflict of Interest

Vaughan has an employee Code of Conduct that requires our employees to declare any situations of conflict which would include any conflict of interest that is associated with the procurement of goods or services from a Supplier.

If a Supplier is linked to an employee whether by shareholdings, family relations, friendship etc Vaughan may require the employee to abstain from any Supplier selection decisions.

Continuous Improvement

We encourage our Suppliers to go beyond minimum compliance to applicable laws and this Code and to take responsibility to continually improve health and safety, social and environmental conditions and ethical behaviour.

Monitoring and Compliance

Suppliers must monitor their compliance with this Code and promptly notify Vaughan of any breaches, allegations of non-compliance or investigation into non-compliance by authorities. Suppliers must take all reasonable steps to address, remedy and prevent any further breaches.

If a Supplier, or another party in its supply chain, is unable to, or fails to, comply with this Code, Vaughan will discuss this issue with the Supplier and may require the Supplier to take such steps as Vaughan considers necessary to address the impact of, and remediate, the non-compliance, or in some cases Vaughan may

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terminate the relevant Supplier agreement.

27.11.2020
Andrew Noble
Managing Director

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