

# Supplier Code of Conduct

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## 1. Introduction

Hindmarsh Construction Australia Pty Ltd (ABN 15 126 578 176) and its related bodies corporate (“Hindmarsh”, “Company”) is committed to upholding ethical standards in regard to its operations and those it does business with.

The Code has been established in alignment with the Hindmarsh values of integrity, safety, teamwork, quality and innovation. Third parties such as suppliers, contractors, subcontractors and consultants are integral to Hindmarsh’s operations. It is essential that third parties connected to the Company share its values, principles and commitments which are outlined in this Supplier Code of Conduct (“Code”).

## 2. Purpose

The Code requires all Hindmarsh Suppliers to take responsibility for their conduct and provides guidelines and standards for the appropriate behaviour expected.

## 3. Scope

This Code applies to third parties connected to Hindmarsh including Hindmarsh’s suppliers, subcontractors, contractors and consultants including all employees, contractors and subcontractors of third parties engaged to supply goods or services to Hindmarsh (“Suppliers”). This extends to all applications and geographical locations.

The expectations outlined in this Code are not intended to supersede or alter the Supplier’s regulatory and contractual obligations. In the event that a Supplier has entered into an agreement with Hindmarsh, where there is any inconsistency between a term of this Code and a term of the agreement, the term of the agreement will prevail to the extent of that inconsistency.

## 4. Hindmarsh’s Expectations

Hindmarsh expects Suppliers to read this Code. Hindmarsh expects Suppliers to communicate this Code to their related entities and their suppliers so they are aware of, understand and comply with the Code.

Hindmarsh is committed to fostering an open and collaborative relationship with our Suppliers. The Company encourage Suppliers to raise concerns or ask questions and aim to create a safe environment to do so. If there are any questions regarding the matters outlined in this Code, Hindmarsh encourages discussion in accordance with the procedures outlined in paragraph 13.

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## 5. Compliance with Laws

Suppliers must comply with the laws in the countries where they operate.

## 6. Key terms

There are capitalised key terms contained within this Code which are defined as follows:

- “Greenhouse Gas Emissions” means the natural and anthropogenic gases that trap thermal radiation in the earth’s atmosphere as specified from time to time in the Kyoto Protocol, each expressed as a total in units of carbon dioxide equivalent (CO<sub>2</sub>e-).
- “Kyoto Protocol” means the Kyoto Protocol to the United Nations Framework Convention on Climate Change.

## 7. Labour and Human Rights

Hindmarsh supports human rights as set out in the Universal Declaration of Human Rights and the ten principles of the UN Global Compact. Further, Hindmarsh is a reporting entity pursuant to the Modern Slavery Act 2018 (Cth).

The Company expects our Suppliers to protect the human rights of workers by offering respect and support. Hindmarsh expects Suppliers to:

- ensure all work is freely chosen without the use of modern slavery including forced, prison or compulsory labour;
- ensure workers are of legal age, preventing any form of child labour;
- ensure no payment of recruitment fees by workers;
- ensure bullying, harassment, discrimination, physical, sexual, psychological or verbal harassment is not tolerated in their organisation;
- pay workers lawful wages, including equal pay for equal work; and
- provide fair working conditions for their employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with local laws.

If Suppliers become aware of a labour incident within their business or supply chains, they must disclose it to Hindmarsh in accordance with the procedure set out below under the “Contact Procedure” heading at paragraph 13. Hindmarsh will endeavour to work alongside the Supplier to resolve any incidents.

## 8. Health and Safety

Under Work, Health and Safety legislation, Hindmarsh is required to provide a safe work environment and therefore must be diligent in considering employee safety. The goal for Hindmarsh is to provide a safe, healthy and secure work environment within its operations and throughout its supply chains.

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To achieve this goal, Suppliers must also provide a safe and healthy workplace for their workers and anyone that could be impacted by their activities. This requires Suppliers to:

- take reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease;
- provide appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties;
- provide personal protective equipment;
- implement effective systems to ensure products and services meet relevant standards and legislative requirements; and
- ensure facilities and amenities for workers (including any accommodation provided) are clean, safe and meet their basic needs.

In conjunction with the requirements above, Hindmarsh also expects that Suppliers:

- support workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination;
- prepare for, respond to, manage and report workplace incidents, injuries or emergencies;
- ensure all its employees attend work free from the influence of illegal drugs and alcohol, and in a condition to perform their duties; and
- have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies; and
- adhere to Hindmarsh's safety requirements at all Hindmarsh sites, where applicable.

For more information about Hindmarsh's commitment to providing a safe and healthy workplace, please refer to the Hindmarsh Work Health and Safety Policy.

## 9. Environmental Considerations

Hindmarsh strives for a sustainable future, and as such, the organisation is committed to minimising the impact on the environment from its business operations. As such, Suppliers are expected to:

- take all reasonable steps to minimise any adverse environmental impacts on their operations, products and services;
- comply with applicable environmental laws, standards and notices from regulators; and
- obtain, maintain, keep current and comply with necessary environmental permits, approvals and registrations.

Hindmarsh may implement environmental targets and initiatives to assist in managing and reducing negative environmental impacts of its operations. Suppliers are expected to assist Hindmarsh in meeting environmental targets and to meet any mandatory reporting requirements. This may include, but is not limited to, the Supplier:

- providing information to Hindmarsh relating to the Suppliers:

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- Greenhouse Gas Emissions; and/or
- energy use, water use, raw material use, chemical use and waste for the purposes of calculating the Supplier's Greenhouse Gas Emissions;
- assisting Hindmarsh in obtaining the above information from the Supplier's suppliers; and
- working with Hindmarsh to reduce the Supplier's Greenhouse Gas Emissions.

More broadly, Suppliers are also expected to:

- minimise the adverse environments impacts of their operations, products and services;
- comply with applicable environmental laws, standards, and notices from regulators; and
- obtain, maintain, keep current and comply with necessary environmental permits, approvals, and registrations.

For further information on Hindmarsh's position on environmental and sustainability considerations, please refer to Hindmarsh Environment and Sustainability Policy'.

## 10. Diversity and Equal Opportunity

Hindmarsh are committed to practices that promote a compassionate, respectful and just community in which all people participate and flourish. We are committed to being a diverse and inclusive workplace. Hindmarsh encourages Suppliers to have an inclusive workplace free of discrimination based on gender, age, race, nationality or ethnic origin, disability, family responsibilities, marital status, medical history, political views, pregnancy or potential pregnancy, religious beliefs or activity, sexuality or sexual orientation, union affiliation, physical appearance, social original or carers' responsibilities.

## 11. Business Integrity

Hindmarsh pursues high standards of conduct and promotes good corporate governance and ethical behaviour. Hindmarsh does not receive improper payments, benefits or gains. The Company expects Suppliers to act ethically, honestly and transparently with us. Suppliers must:

- avoid actual, potential or perceived conflicts of interest with Hindmarsh employees;
- never engage in bribery or corruption;
- never offer, give or promise anything of value directly or indirectly to a government official to influence official action;
- ensure any gifts and hospitality offered or received are reasonable, appropriate, not overly frequent and for legitimate business purposes only;
- follow relevant competition laws and promote fair behaviour;
- comply with data privacy and regulatory requirements when personal information is collected, stored, processed, transmitted or shared;
- respect Hindmarsh's confidential information and not disclose it, expect as required by law or where authorised in writing by Hindmarsh; and
- ensure the protection of whistleblowers.

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## 12. Confidentiality

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Hindmarsh.

Suppliers must not present any information to any third party, including but not limited to media or news outlets, on behalf of Hindmarsh without express approval from Hindmarsh.

## 13. Reporting misconduct, unethical behaviour or suspected corruption

If a Supplier or employee considers that it or another Supplier or employee has deviated from or breached their obligations under this Code, it is expected to report these concerns according to the procedure outlined in the Hindmarsh Whistleblowing Policy & Procedures.

Hindmarsh reminds Suppliers that by agreeing to the Code they have an ongoing obligation while supplying goods and services to Hindmarsh to report any compliance concerns with us.

## 14. Contact Procedure

Any notifications, questions or concerns in relation to this Code or any other matter not raised but related to this Code can be made to:

- Your Hindmarsh representative; or
- Legal Officer at [enquiries@hindmarsh.com.au](mailto:enquiries@hindmarsh.com.au)

Additionally, you can report in accordance with the Hindmarsh Whistleblowing Policy & Procedures.

Version History				
Version	Date Issued	Notes	Author	Approval
1.0	August 2023	New Policy	Cowell Clarke Lawyers	Chief Executive Officer
1.1	May 2024	Minor revisions	Cowell Clarke Lawyers	Chief Executive Officer

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