

Supplier Code of Conduct

1. About this Code

The Supplier Code of Conduct describes the commitment of the BGC group of companies (“BGC”) to ethical, sustainable and socially responsible procurement within our business and our supply chains.

This Supplier Code of Conduct sets out BGC’s expectations of our suppliers in respect to Environmental, Social and Governance. This includes Anti-Slavery and Human Rights, Harassment, Discrimination and Bullying, Ethical Business Practices, Diversity, Inclusion and Respectful Behaviour, Environmental, Health and Safety, Confidentiality and Privacy, and Risk Management.

2. Scope

This code applies to contractors, sub-contractors, agencies, suppliers (including their sub-contractors and employees) that are contracted to BGC. This group will be referred to as “suppliers” in this document.

3. BGC Values and Procurement Principles

These values and fundamental beliefs guide our behaviour and we expect that all BGC suppliers to share our commitment to these values:

- We do what is right;
- We get things done;
- We are accountable;
- We work better together; and
- We continuously improve.

BGC has a long-term view of maintaining relationships with our suppliers. These principles outline our approach to the procurement of goods and services and define the standards we set for BGC employees and our suppliers.

- Value for money;
- Efficiency and Effectiveness;
- Governance and Accountability;
- Fair and open competition; and
- Ethical and socially responsible.

4. Anti-Slavery and Human Rights

BGC is committed to respecting and upholding human rights and prohibits modern slavery in its operations and supply chain. We expect that suppliers to BGC will:

- Ensure fair remuneration and working conditions for their workforce; at the very minimum to the standard as required by law, regulation or industry regulation/industrial agreements in their jurisdiction;
- Conduct business in a manner that upholds and respects human rights and complies with all applicable laws and regulations including the Modern Slavery Act (2018) (Refer to the **BGC Anti-Slavery Policy**);
- Establish process to report workplace violations, misconduct, or grievances without fear of retaliation;
- When requested, provide relevant information as an input into BGC’s reporting; and
- Prohibit any form of modern slavery. This refers to situations where one person has taken away another person’s freedom so that they can be exploited; and may include human trafficking, slavery, servitude, forced labour, debt bondage, child labour, deceptive recruiting for labour or services, and forced marriage.

5. Harassment, Discrimination and Bullying

BGC is committed to providing a workplace free of harassment, discrimination and bullying and that all relevant labour laws and applicable industry regulations are followed wherever the work is being undertaken. We expect that suppliers to BGC will:

- Comply with workplace laws regarding harassment, discrimination and bullying;
- Uphold reasonable standards of behaviour in the workplace at all times;
- Develop and maintain a fair, diverse and inclusive workforce that does not discriminate against any employee on the basis of gender, nationality, race, ethnicity, sexual orientation, marital status, age, impairment, physical appearance, religion, political affiliation or union membership;
- Ensure that all employees and other workers are correctly engaged and that all legal obligations are satisfied; and
- Ensure that employees or other workers are not subject to corporal punishment, physical abuse or discipline, mental or sexual abuse or any type of exploitation.

6. Ethical Business Practices

BGC expects high standards of professional conduct and compliance with all applicable laws. We expect that suppliers to BGC will:

- Comply with all anti-bribery, anti-corruption and anti-money laundering laws;
- Conduct business in a fair, ethical and honest manner;
- Not offer any gifts, entertainment, inducements or benefits which may influence, or be seen to influence, BGC employees, sub-contractors or suppliers (Refer to the **Anti-Bribery and Corruption Policy and Anti-Bribery and Corruption Procedure**);
- Not offer, promise, pay, authorise, accept or request bribes of any form (including facilitation payments and secret commissions); and
- Disclose any actual or potential conflicts of interest and not engage in any collusive or anti-competitive behaviour

7. Diversity, Inclusion and Respectful Behaviour

BGC is committed to promote diversity and equal opportunity both within its own workforce and across its supply chain. We expect that suppliers to BGC will:

- Treat employees and suppliers fairly and respectfully;
- Support their teams to be diverse, engaged, motivated and competent in their roles;
- Ensure recruitment is free from all forms of discrimination (e.g. on the basis of gender, ethnicity, religion, age, marital status, culture, sexual orientation, disability or any other aspect); and
- Promote and increase their diversity both within their business and supply chain including providing opportunities for small and medium size enterprises, social enterprises and enterprises that support diversity and equal opportunity e.g. women-led business and indigenous business.

8. Environmental

As a part of BGC's sustainability journey, we encourage our suppliers to improve the environmental performance of our supply chain. We expect that suppliers to BGC will:

- Comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations;
- Establish programs that seek to minimise the environmental impact of operations and supply chains including reducing greenhouse emissions, waste and efficient use of materials, water and gas;
- Ensure the safe storage, transportation and disposal of hazardous substances and waste; and

- When requested, provide relevant information as an input into BGC's sustainability reporting.

9. Health and Safety

BGC is committed to maintaining a healthy and safe working environment for our suppliers. We work with suppliers that take health and safety as seriously as we do. We expect that suppliers to BGC will:

- Comply with all applicable health and safety laws and regulations;
- Commit to maintaining a healthy and safe workplace which aims to eliminate workplace injuries and illness, report concerns immediately, when health and safety are at risk;
- Provide their workforce with role specific personal protective equipment and appropriate training; and
- Ensure that there is an emergency preparedness plan in place to safeguard employees, operations and security of supply in emergency situations.

10. Confidentiality and Privacy

BGC takes its commitment to confidentiality and privacy seriously. We expect that suppliers to BGC will:

- Comply with applicable privacy laws as well as secure data against unauthorised access;
- Take reasonable measures to ensure that information provided by BGC is kept confidential; and that no document or information is released to any other party without prior approval from BGC; and
- Take due care in handling, discussing, processing, storing, transmitting and disposing of any proprietary, confidential and sensitive information that would affect BGC and its stakeholders.

11. Risk Management

BGC is committed to maintaining processes and systems that identify, assess and manage all risks across our business. We expect that suppliers to BGC will:

- Demonstrate appropriate levels of risk management to ensure compliance with applicable laws, accounting and other business practices;
- Be set up as a company and manage all tax and employer obligations, including but not limited to:
 - Meeting superannuation and insurance obligations for all workers
 - Maintaining a current and valid ABN and GST registration
 - Meeting tax obligations with federal and state authorities
- Have a business continuity plan in place for events that could disrupt BGC's supply chain or service; and
- Promptly advise BGC of any risks that may impact BGC and provide a remediation plan.

12. Compliance

The BGC Supplier Code of Conduct forms part of **Schedule 4 - Policies and Procedures of the BGC Goods and Services Agreements**. BGC intends to work with suppliers to ensure that their performance is aligned with the Code. We may periodically request a self-assessment of performance or assess suppliers' compliance with the Code by requesting supporting documentation. Throughout this process, our objective is to jointly identify opportunities for mitigating risks and improving performance.

13. Reporting

We strongly encourage any supplier who becomes aware of any breach of this Code to discuss this with their BGC contact. As a supplier to BGC, you have access to our confidential independent whistleblowing service, FairCall Whistleblowing Hotline number 1800 500 965, which provides an avenue for serious concerns to be reported. Details of this service and how to make a report are available at <http://www.kpmgfaircall.kpmg.com.au/BGC>

14. Review

All policies at BGC are subject to periodic review to ensure they comply with current legislation and regulations, remain relevant to BGC's organisational values, and meet best practice standards. As of October 2021, the Supplier Code of Conduct is owned by Brian Adams (Executive General Manager – Building Products, IT and Procurement). This code will be reviewed every two (2) years or sooner as determined by the owner.