

Code of ethical policy

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01 Introduction:

We are committed to ensuring a high standard of ethical and environmental trade practices, including the provision of safe working conditions and the protection of workers' rights. We conduct our business in accordance with the provisions of this code of ethical policy and expect our suppliers to observe the provisions and to demonstrate a similar commitment to an on-going programme of ensuring and, where necessary, improving, ethical and environmental practices. The code applies to all areas of our business and to its direct suppliers as well as to goods and services sourced by us. We require all direct suppliers to observe the provisions of this code and require that such suppliers, in turn, obtain similar compliance with its provisions from their suppliers. All parties to whom this code applies are required to comply with applicable national and international laws. Where the provisions of this code afford greater protection than national law, the terms of this code prevail.

02 Policy objective:

The objectives of the code are to:

- Set out a clear statement of our policy
- Promote the adoption and improvement of ethical practices
- Implement effective processes for improvement of trade practices

03 Code compliance:

We recognise that our suppliers may not be able to achieve all the standards laid out in this code immediately but we are willing to engage with suppliers who:

- Have implemented or are willing to implement appropriate and workable processes for raising standards to be compliant with this code within an agreed period
- Are able to demonstrate a responsible and transparent approach to their working and general practices
- Have successfully undergone any required audit or verification procedure in accordance with our audit procedure which demonstrates compliance with our core requirements
- Have demonstrated an on-going commitment to improving working and ethical standards

04 Core requirements:

We will not engage in business with suppliers who do not meet our core requirements and we will be entitled to terminate any contract with any supplier who is found to be non-compliant with any of the core requirements. Such termination on the part of our company may be without notice and shall be without liability of any description on the part of our company (whether to the supplier or any third party contracted by the supplier). Our core requirements are as follows:

- Suppliers must not use any form of forced, bonded or involuntary labour, and workers must not be obliged to lodge identity papers or pay any deposit as a condition of work
- Workers must not be subject to physical or verbal abuse or threats or intimidation of any description
- Workers must not be required to work extreme hours or work without adequate rest periods
- Suppliers must not use workers under the age of fifteen - suppliers must accept the principles of remediation of child and under age workers and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future

- Factories and work sites used by suppliers must be safe and hygienic with an adequate number of safe and accessible fire exits from all buildings including living accommodation and workers must have access to drinking water
- Workers' life or limb must not be endangered due to the use of dangerous machinery, unsafe building structure or layout, or hazardous chemicals - where serious or fatal accidents have occurred suppliers must demonstrate to the satisfaction of our company that all appropriate steps have been taken to prevent similar accidents occurring in the future
- Living accommodation, where provided, must be in buildings that are separate from other areas of the workplace and have an adequate fire alarm system
- Suppliers must pay wages sufficient to meet basic needs and to provide some discretionary income
- Suppliers must maintain proper and accurate employment records including calculation of pay and hours worked and suppliers must be transparent and cooperative as regards the inspection of employment records
- Suppliers must not engage in bribery, corruption or other similar unethical practices in order to gain competitive advantage

05 General provisions:

The general provisions of the code need to be read and applied in conjunction with the core requirements set out above.

Employment of appropriate workers:

- No forced, bonded, or involuntary prison labour may be used in the production of goods - workers must not be required to lodge deposits or identity papers as a condition of work and must be free to leave their employer upon reasonable notice
- No child or under age labour may be used - all workers must have reached the age of fifteen ☒ By entering into an agreement with our company suppliers accept the principles of remediation programmes enabling children and under age workers to return to quality education, even if children and under age workers do not form part of supplier's work force
- Where the use of underage labour is revealed, then without prejudice to our company's right to terminate its supplier agreements under the provisions of the code, suppliers must establish and implement appropriate remediation programmes in cooperation with our company
- Workers under the age of eighteen must not work at night or under potentially hazardous conditions - suppliers must have in place worker management systems for young workers

Working environment:

All workers are entitled to a safe, hygienic working environment and suppliers must ensure that working conditions meet the following standards:

- Suppliers must comply with all national health & safety laws and with the standards
- Suppliers must establish an active Health & Safety Committee on which workers must be represented and which must be consulted on and entitled to participate in the investigation of health & safety matters
- Suppliers must formally appoint a senior manager to be responsible for health & safety issues including compliance with the relevant terms of this code and the establishment and communication of written health & safety policies
- Workers must not be employed in potentially hazardous conditions without regular adequate safety training or supervision - training must include emergency evacuation procedures and for appropriate designated personnel first aid (adequate records of all safety training must be maintained and made available to our company for inspection) - adequate first aid provision must be readily accessible to all workers
- Work places must be well ventilated with comfortable, well lit work stations - no workers may be subject to unsafe or unhealthy working conditions (including dangerous machinery, unsafe building structure or

layout and hazardous chemicals and substances) and all necessary safety equipment must be provided by supplier without charge

- Factories and work sites used by supplier must be safe and hygienic with an adequate number of safe, accessible and clearly marked fire exits from all buildings (including production and storage facilities and office and domestic accommodation used by employees)
- Living accommodation, where provided, must be in buildings that are separate from other areas of the workplace and must have an adequate fire alarm system. In any event suppliers must provide clean bathrooms, access to drinking water, and appropriate food storage facilities

Hours, pay and benefits:

- Suppliers must comply with local legislation regulating employment, hours of work and pay, including any minimum wage, allowances and benefits (including, without limitation, holidays, sick leave, child care, maternity provisions, social security) and must not seek to avoid their legal obligations to workers by any means - in any event wages must be adequate to meet the basic needs of workers and provide a reasonable discretionary income
- Workers must be provided with clear and understandable written information about their employment conditions (including pay and hours of work) before commencing work and suppliers must at all times maintain proper and accurate employment records
- Workers must not be required to work excessive hours and may not ordinarily and regularly work more than 60 hours per week (including overtime) - all workers shall be entitled to at least one day off in each 7 days period and overtime must be strictly voluntary and paid at a premium rate
- Deductions from wages must be of a reasonable sum and relate to the service provided for that deduction - workers must give their express agreement for each deduction and such agreement may not form a part of their employment contract (the use of fines as a disciplinary measure is not permitted)
- Suppliers must comply with all applicable legislation concerning life insurance, health insurance, retirement benefits and workers' compensation

Respect for the individual:

- Suppliers must conduct their business in a manner which recognises the entitlement of all individuals to be treated equitably with dignity and respect and to work in an environment free from harassment, physical and verbal abuse, threats or intimidation of any description
- Disciplinary practices shall be fair and appropriate and must be clearly set out and communicated to workers - workers have the right to appeal and representation at disciplinary proceedings
- Suppliers must not discriminate against workers in any manner on the grounds of gender, religion, race, caste, age, disability, sexual orientation, union membership, political affiliation and national or ethnic origin.

Trade unions:

Suppliers must give all workers the right to join or form trade unions and to organise collective bargaining in a lawful and peaceful manner and suppliers must not discriminate against workers who engage in such activities. Where these rights are restricted by law Suppliers must allow alternative lawful means for independent workers' representation.

Ethical standards:

Suppliers must conduct their businesses in an ethical manner and must not seek to gain competitive advantage by means of unethical or dishonest practices including without limitation; bribery, corruption, kickbacks, the provision of gifts, favours or services.

Environmental standards:

Suppliers must comply with applicable local environmental regulations and such additional environmental standards as we may notify in writing from time to time. In any event suppliers must demonstrate an awareness of environmental matters and a commitment to improving environmental standards, (including without limitation,

waste reduction, increased recycling, reduction of pollution, increased use of environmentally friendly products from sustainable sources) and are to develop and implement a meaningful environmental action plan by which progress can be measured.

Documentation and inspection:

Suppliers must adopt effective systems (including the appointment of a named individual with responsibility for compliance with the code) for the implementation of the provisions of this code by suppliers and for monitoring and documenting compliance with its provisions to the satisfaction of our company. Suppliers shall in turn be responsible for implementing monitoring and recording the compliance of its own suppliers. Suppliers must maintain such documentary records as may be necessary to demonstrate compliance with the terms of this code (or otherwise relating directly or indirectly to the implementation of the code) including a single set of verifiable, accurate and complete records on wages paid and hours worked for each employee, and stored for a period of three years. All such documentation must be original records and available to our company for inspection upon request. Suppliers must permit our company (or its representative or nominees) to enter their premises (and any other work place utilised for or on behalf of supplier, whether or not owned or controlled by supplier) for the purpose of inspecting premises and / or documentation and in order to establish due compliance with the provisions of the code.

Non-compliance:

By entering into an agreement with our company, suppliers hereby agree to and accept the terms of this code. Without prejudice to the provisions of the code or the terms of any agreement between supplier and our company, we shall be entitled in its sole and absolute discretion to terminate all contracts with suppliers with immediate effect and without liability in the event that; suppliers are not be fully compliant with the core requirements at any time, or if, in the reasonable determination of our company, suppliers shall have failed to demonstrate to the satisfaction of our company, a genuine willingness to work towards meeting all of the provisions of the code within a reasonable time. If, in the reasonable opinion of our company, suppliers shall have failed to demonstrate to the satisfaction of our company, sufficient openness and transparency to allow a robust verification of their working practices. In the event that our company considers that a supplier is not in compliance with the core requirements or the wider provisions of this code, the supplier must take all such appropriate remedial actions as requested by BBCW to address any areas of concern.

06 Vision and applicability:

We are committed to doing what is right and honourable. We set high standards for our company and aspire to meet these standards in all aspects of our work. The purpose of this code is to instil confidence in the fit-out and construction sector and to help us provide a better service. We also believe that this code will assist us in making wise decisions, particularly when faced with difficult situations where we may be asked to compromise our integrity or values.

Each section of the code of ethics and professional conduct includes both aspirational and mandatory standards. The aspirational standards describe the conduct that we strive to uphold, although adherence to aspirational standards are not easily measured, conducting ourselves in accordance with these is an expectation that we have of ourselves (it is not optional).

Responsibility:

Responsibility is our duty to take ownership for the decisions we make or fail to make, the actions we take or fail to take and the consequences that result.

Aspirational standards:

- Make decisions and take actions based on the best interests of society, public safety and the environment ☑
Accept only those assignments that are consistent with our background, experience, skills and qualifications ☑ Fulfil the commitments that we undertake

- When we make errors or omissions, we take ownership and make corrections promptly
- When we discover errors or omissions caused by others, we communicate them to the appropriate body as soon they are discovered
- Accept accountability for any issues resulting from our errors or omissions and any resulting consequences
- Protect proprietary or confidential information that has been entrusted to us

Mandatory standards:

- Inform ourselves and uphold the policies, rules, regulations and laws that govern our work
- Report unethical or illegal conduct to appropriate management and if necessary to those affected by the conduct
- Do not engage in any illegal behaviour, including but not limited to theft, fraud, corruption, embezzlement or bribery
- Do not take or abuse the property of others (including intellectual property), nor do we engage in slander or libel
- Do not condone or assist others in engaging in illegal behaviour

Ethics complaints

- Bring violations of this code to the attention of the appropriate body for resolution
- Only file ethics complaints when they are substantiated by facts
- Abstain from accusing others of ethical misconduct when we do not have all the facts
- Pursue disciplinary action against individuals who knowingly make false allegations against others
- Pursue disciplinary action against an individual who retaliates against a person raising ethics concerns

Respect:

Respect is our duty to show a high regard for our company, others and the resources entrusted to us. Resources entrusted to us may include people, money, reputation, the safety of others and natural or environmental resources. An environment of respect engenders trust, confidence and performance excellence by fostering mutual cooperation (an environment where diverse perspectives and views are encouraged and valued).

Aspirational standards:

- Inform ourselves about the norms and customs of others and avoid engaging in behaviours they might consider disrespectful
- Listen to others' points of view, seeking to understand them
- Approach directly those persons with whom we have a conflict or disagreement
- Conduct ourselves in a professional manner even when it is not reciprocated
- An implication of these provisions is that we avoid engaging in gossip and avoid making negative remarks to undermine another person's reputation
- We have a duty under this code to confront others who engage in these types of behaviours

Mandatory standards:

- Negotiate in good faith
- Do not exercise the power of our expertise or position to influence the decisions or actions of others in order to benefit personally at their expense
- Do not act in an abusive manner toward others
- Respect the property rights of others

Fairness:

Fairness is our duty to make decisions and act impartially and objectively. Our conduct must be free from competing self-interest, prejudice and favouritism.

Aspirational standards:

- Demonstrate transparency in our decision-making process ☒ Constantly re-examine our impartiality and objectivity, taking corrective action as appropriate
- Provide equal access to information to those who are authorised to have that information
- Make opportunities equally available to qualified candidates
- In the case of a contracting arrangement, provide equal access to information during the bidding process

Mandatory standards:

- Proactively and fully disclose any real or potential conflicts of interest to the appropriate stakeholders
- When we realise that we have a real or potential conflict of interest, we refrain from engaging in the decision-making process or otherwise attempting to influence outcomes, unless or until we have made full disclosure to the affected stakeholders; have an approved mitigation plan and have obtained the consent of the stakeholders to proceed
- A conflict of interest occurs when we are in a position to influence decisions or other outcomes on behalf of one party when such decisions or outcomes could affect one or more other parties with which we have competing loyalties
- Even if we believe that we can set aside our divided loyalties and make decisions impartially, we treat the appearance of a conflict of interest as a conflict of interest and follow the provisions described in this code

Favouritism and discrimination:

- Do not hire or fire, reward or punish, or award or deny contracts based on personal considerations, including but not limited to, favouritism, nepotism or bribery
- Do not discriminate against others based on, but not limited to, gender, race, age, religion, disability, nationality or sexual orientation
- Apply the rules of the organisation (employer, AIS or other group) without favouritism or prejudice

Honesty:

Honesty is our duty to understand the truth and act in a truthful manner both in our communications and in our conduct.

Aspirational standards:

- Earnestly seek to understand the truth and be truthful in our communications and conduct ☒ Provide accurate information in a timely manner
- An implication of these provisions is that we take appropriate steps to ensure that the information we are basing our decisions upon or providing to others is accurate, reliable and timely
- Having the courage to share bad news even when it may be poorly received
- When outcomes are negative, we avoid burying information or shifting blame to others and when outcomes are positive, we avoid taking credit for the achievements of others
- Make commitments and promises, implied or explicit, in good faith
- Strive to create an environment in which others feel safe to tell the truth

Mandatory standards:

- Do not engage in or condone behaviour that is designed to deceive others, including but not limited to, making misleading or false statements, stating half-truths, providing information out of context or withholding information that, if known, would render our statements as misleading or incomplete
- Do not engage in dishonest behaviour with the intention of personal gain or at the expense of another
- Half-truths and non-disclosures intended to mislead stakeholders are as unprofessional as affirmatively making misrepresentations
- Develop credibility by providing complete and accurate information

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