



CREATIVE CONSTRUCTION™



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# Vendor Code of Conduct



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## 1. Message from our CEO

The McConnell Dowell Group (encompassing Built Environs), a reputable organisation with over 60 years of experience, extends its values and commitment to excellence to its Vendors and partners. As a Vendor associated with the McConnell Dowell Group, you are an integral part of our mission to enhance lives through the delivery of quality assets and facilities across diverse global landscapes.

Aligned with our core values of safety and care, honesty and integrity, customer focus, working together, and performance excellence, we expect all Vendors to uphold these principles in every aspect of their engagement with us.



Our Vendor Code of Conduct serves as a comprehensive guide to ensure that all interactions and transactions with the McConnell Dowell Group are conducted ethically, transparently, and with the highest standards of integrity. We encourage you to familiarise yourself with this code to make well-informed decisions, lead by example, and speak up against any behaviour that deviates from our shared standards.

Whether you are a supplier, contractor, or service provider, your adherence to our Vendor Code of Conduct is vital in maintaining the integrity of our partnerships and in contributing to the success of our projects. Together, we uphold the McConnell Dowell Group's reputation as a trusted and responsible leader in delivering complex infrastructure and building solutions that benefit our customers and communities.

Thank you for your commitment to our Purpose, Values, and Code of Conduct, which ensures mutual success and sustainability in our collaborations.

A handwritten signature in black ink, appearing to read 'Scott Cummins'.

**Scott Cummins**

**CEO, Aveng Group**

**Parent Company of McConnell Dowell Group**



## 2. About the Code

The McConnell Dowell Group seeks to work with its Vendors to meet and exceed minimum expectations and mandatory requirements as outlined in this Code and continuously strives to improve the standard of its business practices. Vendor means any entity that supplies goods or services (directly or indirectly), including construction works and services to the McConnell Dowell Group. Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Vendor and its related entities. Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured, or services are performed.

Fundamental to this Code is an expectation that all Vendors operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the Vendor's regulatory and contractual obligations. The McConnell Dowell Group expects all existing and new Vendors to commit to the Code. Vendors should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

The McConnell Dowell Group expects Vendors to communicate the Code to their related entities, suppliers and subcontractors who support them in providing goods and services to the McConnell Dowell Group, so that they are aware of, understand and comply with the Code.

## 3. What we require of You

### 3.1 Professional Standards

#### **Compliance with relevant legislation**

In addition to any specific items mentioned elsewhere within this Code of Conduct, you must comply with all relevant legislation.

#### **Meeting required standards**

The goods and services provided should meet relevant compliance requirements and the Australian Standard (or an international standard in the absence of an Australian Standard) where specified. For building and construction this also includes using conforming products and materials.

#### **Cyber Security vigilance**

Recognising the critical role cybersecurity plays in protecting both our operations and those of our partners, we insist that all Vendors and their subcontractors maintain a high level of cybersecurity protection and compliance, including with our cybersecurity policies, where applicable. This proactive stance is designed to safeguard sensitive data, systems, and networks essential to our operations and communications. Vendors are required to implement industry-standard cybersecurity measures, report security incidents immediately, and may be required to undergo periodic cyber security assessments.

### 3.2 Ethical Expectations

Our procurement is conducted in an environment of integrity, probity and accountability. We are committed to the highest ethical standards and expect our Vendors to commit to the same.



You can show this by doing the following:

### **Managing conflicts of interest**

You must ensure that all conflicts of interest (whether actual, reasonably perceived or that could arise in future) are disclosed as soon as possible. This disclosure must occur during all stages of the procurement process when a conflict of interest arises. In addition, Vendors should submit a copy of their conflicts of interest policy where they have one.

### **Demonstrating high standards of conduct**

You must ensure that your business' behaviour is beyond reproach. You must not engage in fraudulent or corrupt activities including, for example, bribery or money laundering, or act in any manner which, by association, brings the McConnell Dowell Group into disrepute.

### **Handling information**

A diligent and practical approach must be taken to ensure sensitive information is appropriately managed in line with confidentiality agreements and any policies.

### **Not engaging in inappropriate supply market behaviours**

You should encourage innovation and competition and must not act in a manner which involves a misuse of your market power or would be otherwise improper (e.g. collusive arrangements). This includes not procuring or selling dumped goods.

### **Acting properly toward McConnell Dowell Group employees**

You are expected to respect the ethical and code of conduct requirements that our employees need to meet, and not engage in actions which run counter to these obligations. You must not try to influence decision making through the use of inducements (e.g. offering gifts and benefits). Your conduct should recognise the expected integrity and accountability of our employees.

### **Model good business practices**

Your business should be conducted in a way that shows best practice corporate management. This includes promoting a collaborative relationship where we work together to resolve issues in a timely and respectful manner. This helps to avoid contractual disputes and promotes good working relationships.

### **Social Media and Promotion**

The McConnell Dowell and Built Environs' names and brands cannot be used to promote a Vendor's business without prior approval by the McConnell Dowell Group. This includes using or posting logos, case studies / testimonials etc on websites and social media channels like LinkedIn, Facebook YouTube and Instagram.

### **[Sub] Subcontractor payment terms**

We want to do business with Vendors that offer payment terms to your Vendors (suppliers and subcontractors) that are no less favourable than those provided to you by the McConnell Dowell Group (unless otherwise mutually agreed with the subcontractor).



### 3.3 Social Expectations

We want to do business with Vendors who support the welfare of their employees and the broader community. You can show this by doing the following:

#### **Managing workplace health and safety**

As well as complying with all workplace health and safety laws and regulations, you should also regularly manage and review workplace hazards and provide any required training to your employees. This includes proactively engaging with employees, industry bodies and unions.

#### **Acting to stop domestic and family violence**

The McConnell Dowell Group is committed to ending domestic and family violence. We ask that you support this by implementing appropriate initiatives within your business, such as having a stated zero tolerance approach to domestic and family violence or having a workplace domestic and family violence policy in place.

#### **Treating employees fairly**

You must respect every worker's workplace right and entitlement and ensure compliance with all relevant workplace laws, regulations, and instruments. This includes properly paying employees, giving them their entitlements, not discriminating unlawfully, and committing to workplaces free of harassment. This includes recognising the right of employees to be members of trade unions.

#### **Acting against human rights exploitation in the supply chain, including addressing modern slavery risks**

You must make all reasonable efforts to ensure that businesses within your supply chain are not benefiting from, engaged in or complicit with, human rights exploitations such as forced or child labour, coercion, sexual exploitation, abuse, harassment or any type of modern slavery practice. This includes conducting appropriate risk assessments and managing identified risks in vulnerable industries (such as textiles, clothing, and footwear), and where relevant, establishing policies, training and practices that address supply chain risks of modern slavery and other human rights exploitation.

#### **Ensuring workplace diversity**

We want to enhance workplace diversity. We value businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people.

This includes embracing social benefit opportunities such as training and employment opportunities for disadvantaged and marginalised jobseekers.

#### **Providing quality, secure local jobs**

We value Vendors who provide quality, secure local jobs. These jobs provide:

- employment where people live
- permanency of employment
- certainty of hours
- fair wages and conditions
- genuine respect for the rights of workers to collectively bargain.



### 3.4 Environmental Expectations

We want to procure in a way that also protects and advances environmental priorities. You can show this by doing the following to improve environmental outcomes. Things you can do include, but are not limited to:

- waste minimisation and recycling
- reducing and/or offsetting carbon emissions
- using solar or other renewable energy where possible
- reducing the use of energy, water, or other resources
- reducing the use of hazardous and toxic substances, and ensuring their correct disposal
- minimising packaging.

## 4. Compliance with the Code

Vendors are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation, or review. Vendors are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code.

If requested, Vendors must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance. The McConnell Dowell Group may cease dealing with any Vendor who is found to have acted unethically or illegally, or who has persistently failed to comply with the Code.

