



Mirvac Vendor Code of Conduct

This *Vendor Code of Conduct* (VCOC) aims to encourage, educate, support and, where appropriate, mandate requirements that will assist Mirvac and people who supply goods and services to Mirvac (Vendors) to contribute to sustainable business operations.

The VCOC outlines Mirvac's commitment to, and expectations of, its Vendors and the production and delivery of all their goods and services.

The VCOC applies to all Vendors employed across all areas of Mirvac's operations. Vendors who engage sub-contractors, on Mirvac jobs, are encouraged to share the VCOC principles with them.

Mirvac's responsibility is to ensure:

- Promotion of fair and open competition;
- Elimination of fraud and collusion;
- Responsible sourcing activities;
- Equitable treatment of Vendors in accordance with laws, regulations and standards empowered to regulate the industries in which it operates;
- A sustainable and diverse supply chain and
- Consideration of sourcing solutions that minimise environmental and social impacts and support Mirvac's triple bottom line responsibilities.

Definitions

- *Vendor*: refers to all suppliers and subcontractors (supply chain) engaged by Mirvac
- *Workplace Participant*: refers to non-executive Directors and employees of Mirvac
- *Areas of operation*: refers to both geographic and sector based as deemed appropriate by the Vendor.
- *VCOC Categories*: Governance, People, Community, Supply Chain Management and Environment.
- *Modern Slavery*: any form of labour where one person takes another's freedom. This can include, but is not limited to child labour, forced labour and debt bondage.
- *Direct or indirect discrimination*: includes but is not limited to harassment or bullying on the grounds of: gender, age, race, nationality or ethnic origin, disability, family responsibilities or parental status, marital status, the occupation of spouse or partner, medical, irrelevant criminal record, political convictions, pregnancy or potential pregnancy, religious beliefs or activities, sexual preference or sexuality, industrial activity or union membership, physical appearance or carer's responsibilities i.e. a diverse workplace.

Governance

- The Vendor shall comply with all local and national laws and regulations in the areas in which they operate with regard to sustainability, including but not limited to:
 - Environment: including waste, recycling, handling toxic substances, emissions, pollution, noise, product transportation, materials selection and environmental management;
 - Employment & labour conditions: including pay, leave, working conditions, anti-discrimination and health & safety;

- Governance: including bribery, corruption, anti-money laundering, counter terrorism, responsible financing and prohibited business practices; and
- Community engagement and consultation.
- The Vendor shall provide a formal complaints management process, such as a whistle blowers line, aligning with the Standards of Australia or equivalent international standard for all employees, their own supply chain and members of the communities in which they operate or provide services to.
- The Vendor shall ensure all workers are aware of [Mirvac's Open Line Policy](#) and understand they can register any concerns around processes or procedures they have encountered while working with Mirvac. The Open Line Policy provides the option of reporting anonymously or named, and ensures an objective, confidential and independent reporting and investigation process overseen by the Open Line Committee.
- The Vendor should be aware of, and where possible, align with Mirvac published policies. (social, environmental, HSE)

People

- The Vendor shall :
 - ensure a process is in place to capture any conflict of interest, which Mirvac may request to review
 - provide a workplace free of discrimination, bullying or harassment;
 - not use *modern slavery* any form,
 - Comply with international human rights laws guided by the United Nations Building principles and norms set out by the International labour Organisation
 - Mirvac has a zero tolerance of violence against women as supported by our efforts to obtain White Ribbon Workplace Accreditation. Violence against women is defined by the United Nations as “any act of gender based violence that results in or is likely to result in physical, sexual or physiological harm or suffering to women”. The Vendor acknowledges and undertakes to uphold a zero tolerance towards violence against any person in the workplace.

Community

- The Vendor shall strive to contribute to the local communities in which they operate and shall ensure that they have procedures in place to minimise any negative impacts to these communities.

Supply Chain

- The Vendor shall have a process in place to identify and manage environmental, social and governance risk within their own supply chain. This shall cover the *VCOC categories* detailed in this Code of Conduct when dealing with their Tier 1 vendors. Tier 1 vendors will be defined by the business itself and may include the following categories:
 - High spend;
 - Long-term or strategic alliance;
 - Potential for high environmental, social and governance risk; or
 - Sole supplier of critical product or services.

Environment

- The Vendor shall have or be working towards an environmental policy.