

1 PURPOSE

The purpose of this Supplier Code of Conduct (hereafter referred to as the “Code”) is to outline Gamuda Australia’s (GA) standards and requirements for conduct and practices for all suppliers, consultants and subcontractors engaged with GA. Specifically, these requirements relate to the areas of behaviour, corporate governance, labour and human rights practices, health and safety, environmental stewardship, and management practices.

2 SCOPE

This Code is applicable to all suppliers, consultants and subcontractors (hereafter referred to as “Suppliers”) engaged by GA, including those involved in any capacity with GA’s projects.

3 APPLICATION

Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier 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.

Crucial to the Code is the requirement that all Suppliers adhere fully to the laws, rules, and regulations of the jurisdictions in which they conduct business.

Suppliers to GA are expected to:

- Read and understand the Code.
- Check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in the Code.
- Conduct their operations in alignment with the Code and apply the Code in their dealings with GA.
- Take appropriate measures to communicate this Code to all employees, subcontractors, agents, suppliers or other third parties in their own supply chains with whom they engage in the performance of services or the supply of goods to GA.
- Use reasonable means to ensure Suppliers’ own supply chains also act consistently with this Supplier Code.

4 DEFINITIONS

Gamuda Australia (GA)

Gamuda Australia or GA is the term used throughout the integrated management system to refer to any or all (as the context requires) of the Australian registered business entities whose ultimate parent company is Gamuda Berhard and includes the following entities:

- Gamuda Holdings Pty Ltd (ACN 665 763 020) (“GH”)
- Gamuda Engineering Pty Ltd (ACN 636 433 522) (“GE”)
- Tunnelling Solutions Pty Ltd (ACN 169 917 551) (“TS”)

Personnel	means any directors, officers, employees (whether permanent, fixed term or temporary), consultants, seconded staff, agency staff and independent contractors engaged by GA.
Policies and Procedures	means the existing policies and procedures approved, adapted, and followed at GA.

5 COMPLIANCE AND STANDARDS OF BEHAVIOUR

5.1 Integrity, Ethics and Conduct

The Code is designed to complement and align with GA's Code of Conduct [**Document Reference GA-POL-HRA-002 Code of Conduct**], ensuring consistency across all interactions within GA's business environment.

Suppliers are expected to act ethically and lawfully in accordance with this Code, demonstrating high standards of ethical conduct, honesty, integrity, and transparency in all dealings, including relationships, practices, sourcing and operations. Any conflict of interest must be effectively managed and promptly disclosed to the Supplier's Conflict of Interest Manager alternatively, the most appropriate person or manager within the Supplier who manages conflicts of interest to determine the materiality and impact of the conflict of interest and mitigate the conflict of interest.

5.2 Legal Compliance

Suppliers must adhere to all applicable laws and GA Policies and Procedures. In instances where this Code sets higher standards than local laws or norms, the standards of this Code will prevail.

5.3 Corporate Governance and Business Practices

Commitment to sound management administration, and risk and corrective action systems, are key to a reliable supply chain for GA. Suppliers are expected to maintain sound administration processes and conduct their operations in a manner that is fair and professional, ensuring compliance with laws related to safety, fraud, corruption, and unethical behaviour.

5.4 Record keeping and documentation

Suppliers are expected to maintain adequate documentation that accurately records all financial transactions and information regarding its business activities, labour, health and safety, and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information, where required by GA, is expected to be undertaken without falsification or misrepresentation.

5.5 Audits and Assessments

Suppliers are to ensure compliance with this Code and the applicable laws cooperate openly and honestly with any GA audit, assessment or review.

6 HEALTH, SAFETY AND ENVIRONMENT

6.1 Health and Safety

GA prioritises a safe and healthy working environment by promoting healthy leadership, reporting, safety and wellbeing in all aspects of its business.

Suppliers must manage occupational health and safety hazards, provide workers with job-related training, consult with employees in relation to the provision of information and training, and observe and comply with all safety regulations and laws along with GA's Health, Safety and Well Being Policy [**Document Reference GA-POL-HSEQ-001**].

6.2 The Environment

GA values the natural environment and cultural heritage and is committed to environmentally responsible and sustainable work practices.

Suppliers are expected to minimise the environmental impacts of their operations, comply with all applicable laws and regulations relating to the environment, including any management and reporting obligation and are encouraged to align themselves with GA's Environment Policy [**Document Reference GA-POL-HSEQ-002**].

7 PEOPLE AND WORKPLACE BEHAVIOUR

7.1 Diversity and Inclusion

In accordance with GA's Discrimination Bullying and Harassment Policy [**Document Reference GA-POL-HRA-008**], GA is dedicated to creating a diverse and inclusive environment.

Suppliers are encouraged to support this commitment, ensuring their workplaces are free from bullying, harassment (which can be verbal, physical, sexual or psychological), discrimination, abuse or vilification.

Suppliers are expected to follow all applicable laws and regulations and all diversity and inclusion commitments and objects of each respective project they are engaged on, with respect to unlawful discrimination, bullying and sexual harassment.

7.2 Human Rights and Labour Practices

GA value all human rights and is committed to ensuring that all business is conducted in a fair, safe, honest and open working environment.

Suppliers are expected to uphold and protect human rights and take a zero-tolerance approach to modern slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage and child labour and take proactive steps to manage potential risks in their business operation and supply chains. Suppliers must comply with the Australian Modern Slavery Act 2018 (Cth).

7.3 Freedom of Association and Collective Bargaining

Suppliers are expected to comply with the Fair Work Act 2009 (Cth), ensuring workers can freely associate, join or refrain from joining industrial organisations, and engage in collective bargaining or lawful industrial activity without interference, discrimination, retaliation or harassment.

7.4 Working hours, wages and benefits

Suppliers are expected to:

- Provide fair and consistent workplace conditions for their employees by complying with the National Employment Standards in Australia contained in the Fair Works Act 2009 (Cth) and all applicable regulations with respect to aspects such as wages, payment of superannuation, annual leave, personal/carer's leave, parental leave, redundancy pay, working hours and workers compensation insurance, whilst ensuring that those that act as suppliers, to the Suppliers, also comply.
- Ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays.
- Pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

7.5 Privacy, Data Protection, Confidentiality and Cyber Security

GA respects privacy and is committed to complying with the Privacy Act 1988 (Cth) and its Privacy Policy located at <https://gamuda.com.au/>, which applies to all confidential, personal and sensitive information collected by GA in relation to GA's operations and sets out how GA collects, uses, stores and discloses this personal information. Confidential or sensitive information includes all information relating to GA and its business affairs that are not in the public domain.

Suppliers are expected to treat personal information lawfully and fairly, in line with the Privacy Act 988 (Cth). Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with GA, competitors, joint venture partners, customers, or suppliers for personal benefit or convey this information to others before it becomes public.

Suppliers must use reasonable safeguards to protect GA's sensitive information against loss, theft, destruction or unauthorised access, use, alteration or disclosure.

Suppliers must ensure appropriate cyber security measures are in place to appropriately manage the risk of internal and external cyber threats and unless otherwise agreed with GA, retain GA sensitive information for a period no longer than is legally required or necessary to perform their obligations to GA.

8 STAKEHOLDER AND COMMUNITY ENGAGEMENT AND SOCIAL PROCUREMENT

GA, in line with its Social Procurement Policy [**Document Reference GA-POL-HSEQ-007**], is committed to acting responsibly within the environment and local communities and to procuring goods and services in an efficient, ethical, and sustainable manner.

Suppliers are expected to conduct themselves respectfully and to positively impact the communities where GA operates. Suppliers should align their operations in line with ISO 20400 and consider opportunities to support these communities, including exploring procurement opportunities for small and medium enterprises, Indigenous businesses, social enterprises, and disadvantaged groups.

9 WORKING PRACTICES

9.1 Anti-Bribery and Corruption and Anti-Money Laundering

In accordance with its' Anti-Bribery and Corruption Policy [**Document Reference GA-POL-HRA-004**], GA has a zero-tolerance approach to any form of bribery, corruption and money laundering, with a strong commitment to ensuring that all business dealings are conducted in an honest, ethical, and fair manner.

Suppliers must avoid all forms of bribery, corruption and money laundering, and adhere to all relevant laws, including the prohibition of facilitation payments.

9.2 Gifts and Hospitality

GA is committed to the highest standards of integrity, impartiality and accountability and the appropriate handling of offers or gifts, benefits and hospitality is paramount to GA.

Any gifts or hospitality offered or accepted must be for legitimate business purposes, not intended to influence business decisions unduly. Suppliers must not request gifts or hospitality.

9.3 Anti-Competitive Conduct

GA is committed to ensuring compliance with anti-corruption and anti-trust laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive practices such as price fixing schemes, misleading or deceptive conduct, misuse of market power or bid rigging arrangements, and must maintain GA's independence at all times.

The Supplier must take reasonable steps to have appropriate policies and procedures in place to prevent anti-competitive behaviour.

10 ASSETS AND RESOURCES

Suppliers must respect and protect GA's assets and resources, using them only for legitimate business purposes. This includes physical property, funds, intellectual property, and confidential information

11 REPORTING AND INVESTIGATION BREACHES

GA is committed to maintaining an environment where people feel safe to speak up on matters that concern them, protecting whistleblowers from victimisation, ensuring confidentiality, and conducting thorough investigations of all reported concerns.

Suppliers are encouraged to speak up if they observe conduct that is concerning and report any breaches or suspected breaches of this Code.

Suppliers are encouraged to follow GA's Whistleblower Policy [**Document Reference GA-MSP-HRA-004**]. Whistleblowers may make a disclosure to GA's external independent whistleblowing service using any of the following methods:

- Contact Noble Shore, GA's dedicated external whistleblower service through the following means:
 - Whistleblower Hotline Number: P: 1300 350 488
 - Whistleblower email: report@nobleshore.com.au

- Contact the relevant independent regularity body or similar to make a disclosure.

All reported breaches will be investigated. If a breach is found to have occurred, GA will take appropriate action.

12 DECISION-MAKING FRAMEWORK

Suppliers should assess their decisions against this Code, considering the potential perceptions and impacts of their actions. GA encourages Suppliers to reach out and seek guidance from their designated point of contact at GA whenever there is doubt about the appropriate course of action.

13 ACKNOWLEDGEMENT

Suppliers engaged with GA are required to acknowledge their understanding and commitment to uphold the standards outlined in this Code, fostering a partnership based on mutual respect, integrity, and success.

Adherence to this Code by all parties is essential to maintaining the integrity and success of GA's projects and business relationships.

14 REVIEW

This Code is to be reviewed annually and updated as needed to ensure its effectiveness and compliance with changing laws and organisational needs.

Reviews are to examine the appropriateness of this Code, taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

15 RECORDS

Document Type	Document Title
Procedure	GA-MSP-HRA-004 Whistleblowing Procedure
Policy	GA-POL-HRA-002 Code of Conduct Policy
	GA-POL-HRA-004 Anti-Bribery and Corruption Policy
	GA-POL-HRA-008 Discrimination Bullying and Harassment Policy
	GA-POL-HSEQ-001 Health, Safety and Well Being Policy
	GA-POL-HSEQ-002 Environmental Policy
	GA-POL-HSEQ-007 Social Procurement Policy