

Supplier Code of Conduct

Introduction

J&P Richardson Industries Pty Ltd (JPR) is committed to ensuring its own corporate values and behaviour standards are reflected by the suppliers, subcontractors and consultants (Suppliers) it engages and via its methods of engagement.

Our values guide us and define us. They guide our decisions and behaviours, underpin how we do business and shape our culture. In our business, we achieve success through our values of **safety, delivery** and **integrity**.

Our values are mirrored in those of our parent company, VINCI Energies and its parent, VINCI SA. The VINCI Code of Ethics and Conduct, Guide on Human Rights and Essential and Fundamental Actions regarding Occupational Health and Safety can be found [here](#) for your information.

This Supplier Code of Conduct (**Code**) aims to set out the corporate behaviour expectations that JPR has of its Suppliers. It covers expectations regarding a number of areas, including but not limited to, anti-corruption and anti-bribery, anti-discrimination, environmental obligations, sustainability practices and aspirations, privacy, modern slavery and gender diversity.

Our hope is that our Suppliers will embrace these expectations when they engage with JPR so that we can collectively operate as ethical corporate citizens, cognisant of our obligations to the community and the future.

JPR reserves the right to prioritise doing business with suppliers who can demonstrate compliance with this Code and the objectives it embodies.

Fundamental Expectation

As a minimum, all JPR Suppliers are required to comply with all contractual obligations with JPR and the laws, regulations, policies of the areas in which they operate. In addition to this basic requirement, JPR Suppliers are expected to:

- have read and understood this Code;
- adopt the behaviours and practices referred to in this Code during its dealings with JPR;
- communicate the behaviours, practices and expectations set out in the Code to all employees, subcontractors and suppliers of the Supplier's own supply chains; and
- take reasonable steps to ensure the Suppliers' own supply chains also adopt the behaviour expectations and practices set out in this Code.

Corporate Governance

It is JPR's expectation that its Suppliers:

- operate their businesses fairly, equitably and in a professional manner;
- comply with all laws, regulations, policies and industry standards in place in their area of operation. This includes having all required qualifications, certifications and licences to operate;
- Maintain good records and adopt a culture of continuous improvement; and
- declare any interest they have, that may conflict or be perceived to conflict with JPR.

Workplace Health & Safety

Safety is our first priority. JPR's Supplier's must share this commitment to safety.

Suppliers must:

- follow JPR policies and procedures for all health and safety related matters, on all JPR projects and sites;
- understand and follow any JPR directives and site requirements related to health and safety whilst on any JPR project or site;
- critically assess work tasks, directions and work sites to assist in identifying, eliminating or mitigating the risk of incident or injury;
- stop work if it is unsafe to continue and report any task which might be unsafe; and
- adequately supervise works and ensure all employees are in a fit and safe state to attend work.

Environmental Management and Sustainability

JPR's objective is to adopt environmentally friendly and sustainable approaches to its work and its engagement of Suppliers, for the benefit of the community and the planet. JPR has long-term aspirations to:

- **Act for the Climate** by reducing direct and indirect greenhouse gas emissions;
- **Optimise Recovery (Circular Economy)** through waste recovery, greater use of recycled materials, and adopting more sustainable building techniques and materials; and
- **Preserving Natural Environments** by implementing environmental management plans, optimising water consumption, and pursuing a target of zero net loss of biodiversity.

JPR's aspirations are shared by its parent company, making this a global objective. JPR looks forward to working with its Suppliers to assist in achieving these goals.

With the above objectives in mind, JPR encourages Suppliers to offer sustainable alternatives when providing goods and services and embrace the above objectives as their own. Suppliers are expected to:

- minimise harm to the environment wherever possible;
- adopt more sustainable practices within their operations including but not limited to, reducing pollution, recycling and reusing materials, conserving use of natural resources;
- develop and implement an environmental policy to apply to its own supply chains, to further promote environmentally friendly and sustainable practices; and
- co-operate with JPR to measure and track the sustainability performance of goods and services supplied to JPR (and its customers).

Human Rights, Labour Policies, Diversity and Anti-Discrimination

JPR is proud of its diverse, inclusive and respectful workplace. JPR expects its Suppliers to adopt the same approach to their own workforces and treat their employees and others with respect, dignity, fairness and equality.

Suppliers are expected to:

- promote an inclusive workplace that values difference and rejects any form of bullying, harassment, discrimination or other unlawful behaviour;
- promote gender diversity and positive mental health practices and support in the workplace;
- insist upon the lawful engagement of employees, ensuring that all workers have the appropriate visas / permits to legally perform work in Australia and also in respect to working conditions, including rates of pay;
- offer genuine opportunities to all individuals within the organisation and embrace all skillsets, backgrounds and personal circumstances; and
- support employees to develop their technical and professional skills by engaging in training programs.

Modern Slavery

Modern slavery is the severe exploitation of an individual via various methods, including but not limited to, the trafficking of a person, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment practices and child labour. JPR strongly opposes this type of conduct. JPR prohibits conduct of this nature within its own organisation and insists that its Suppliers do too.

Suppliers are expected to:

- take all reasonable steps to investigate their supply chains, to ensure that ethical labour polices, the sourcing of materials and services is done in accordance with all laws and in a fair and ethical manner;
- not use and prohibit use within its supply chains, any form of child, forced or involuntary labour;
- only use lawful and ethically acceptable methods to discipline employees;

- ensure all employees, subcontractors, consultants of the Supplier are lawfully engaged, including in respect to payment terms and have all necessary visas or permits to be able to work in Australia;
- actively advocate for lawful employment/ engagement practices within the Supplier's own supply chains and oppose any form of Modern Slavery;
- put in place systems to identify Modern Slavery risks and work towards reducing those risks; and
- upon request by JPR, provide information and documentation regarding the systems in place and data regarding modern slavery risks in the Supplier's own organisation and its supply chains.

Quality

JPR is proud of its commitment to quality, in all aspect of its business.

Suppliers are expected to share this commitment to quality by doing the following:

- ensuring that all products and materials used for or in JPR works meet all requirements of any laws or standards;
- ensure that any manufacturers' specifications for testing and installation are complied with;
- not replace a specified product without prior written approval;
- ensure that products provided to JPR do not contain any unacceptable or hazardous materials;
- take reasonable steps to source ethical materials; and
- work with JPR to provide all documentation and information necessary regarding quality measures in place.

Anti-Corruption and Anti-Bribery

JPR does not tolerate any form of bribery or corruption within its organisations or supply chains.

Suppliers to JPR must:

- act ethically and take no steps to gain any sort of favour or beneficial treatment in exchange for bribes, payments, cash, gifts or favours in general, or any item of inappropriate value;
- never offer any sort of favour, kick back, assurance or anything inappropriate with the view of obtaining special treatment in return or some kind of improper advantage;
- report all instances of actual or indicated improper payments;
- not engage in any kind of anti-competitive conduct. This kind of conduct might include, but is not limited to, price fixing, insider trading, misleading or deceptive conduct, bid rigging, misuse of market power or coercive behaviour; and
- ensure that it has all appropriate policies, procedures and training in place within its organisation to combat the types of behaviour listed above.

Data Protection, Privacy, Confidentiality and Cyber Security

Whilst conducting its operations, it is necessary for JPR to collect, use, retain and disclose personal information and confidential information related to its commercial endeavours (**JPR Data**) to meet its business requirements.

Suppliers are expected to:

- review JPR's Privacy Policy [here](#) and implement their own privacy policy framework within their own organisations, of a similar standard;
- take reasonable steps to protect personal information, including JPR Data, against unauthorised access or disclosure, theft or loss;
- ensure that it has appropriate IT systems, firewalls and protections in place to secure any digital data on its networks;
- unless otherwise agreed with JPR, not retain JPR Data for longer than required for the purposes of the works/ services being provided;
- restrict access to JPR Data where access is not required for the intended purpose for which it was obtained; and
- inform JPR of, and cooperate with JPR in relation to, any data breach or incident that may affect JPR Data.

Supplier Diversity and Community Investment

JPR is proud of the connections it makes within the local communities where it operates. Diversity comes in many forms. In relation to its business operations and engagement of suppliers, JPR endeavours to support local businesses of varying types and backgrounds.

JPR expects its Suppliers to:

- share JPR's commitment to supporting local and diverse businesses;
- engage local and diverse businesses in its own supply chains;
- support community engagement and education programs wherever possible and also support JPR in its objective in this regard; and
- where possible, keep records of all activities in relation to community investment (including supporting local businesses) and provide that information to JPR upon request.

Make a Report

If a Supplier is concerned about an act or situation which is inconsistent with the expectations set out in this Code, JPR strongly encourages the Supplier to report that matter to JPR as soon as possible. A report can be made to the Supplier's usual contact at JPR, a Business Unit Manager, or to one of JPR's Disclosure Officers, listed below:

JPRs Disclosure Officers are as follows:

| Name of Disclosure Officer & Title | Contact Details |
|---|---|
| Harry Ashton Managing Director | Email: harry.ashton@vinci-energies.com Mobile Phone: 0476 841 860 |
| Simon Smith Chief Financial Officer | Email: simon.smith@vinci-energies.com Mobile Phone: 0427 249 817 |
| Greer Davies Head of Legal | Email: greer.davies@vinci-energies.com Mobile phone: 0418 730 452 |

Alternatively, to make a confidential report, a Supplier can send an email to JPR's Whistleblower Report email at jprsupport.confidential@jpr.com.au (marked to the attention of one of the Disclosure Officers referred to above).

Reports may also be made by mailing them to J&P Richardson Industries, Post Office Box 228, Archerfield BC, Qld 4108 (marked to the attention of one of the Disclosure Officers referred to above).

Acknowledgement

By supplying and continuing to supply services, parts, materials or equipment to JPR, the Supplier acknowledges and understands the following:

- it is JPR's expectation that the Supplier will comply with the behaviour expectations set out in this Code;
- it is JPR's expectation that the Supplier will, where possible, cause its own supply chains to commit to a set of behaviour standards similar to those contained in this Code;
- it is JPR's expectation that the Supplier will cooperate with all reasonable requests for data, information or documentation regarding compliance with the standards in this Code; and
- JPR reserves its right to base its decision to engage a Supplier upon the Supplier's willingness to embrace the behaviours set out in this document and require the same standards of their own supply chains.