

# SUPPLIER CODE OF CONDUCT

Johns Lyng Group Limited



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### Introduction

Johns Lyng Group Ltd (JLG) is a market leading integrated building services group delivering building and restoration services across Australia. Underpinned by core values of: respect, integrity, courtesy and honesty; JLG defines itself by delivering exceptional customer service outcomes every time.

JLG is committed to ensuring socially and environmentally responsible sourcing practices across our entire supply chain. A key means of implementing this commitment is through our Supplier Code of Conduct, which includes minimum standards of conduct that all Suppliers must meet as a condition of doing business with JLG.

# **Compliance with our Supplier Code of Conduct**

The JLG Supplier Code of Conduct ("Code") applies to all JLG Suppliers ("Suppliers"). This includes Suppliers of the goods we use in our operations, our service providers and the contractors we engage to undertake work for and on behalf of JLG.

The Code describes minimum standards for all JLG Suppliers in the areas of: legal compliance; business integrity; labour and human rights; health and safety; and environmental management.

Suppliers must review our Code and be familiar with its requirements. Suppliers must ensure their own suppliers and authorised sub-contractors also comply with the standards of conduct outlined in this Code.

The Code forms part of the contract with our Suppliers and in the event of a non-compliance with the Code, we expect the Supplier to develop an action plan to address and remediate it. We also reserve the right to discontinue business with the Supplier.

The Code does not replace the local laws of the countries in which our Suppliers operate. In the event of a conflict between the Code and a local law, the more stringent requirement should be followed.

## **Reporting Violations**

Any person, including workers of a Supplier, may report actual or suspected violations of this Code to JLG via <u>complianceofficer@johnslyng.com.au</u>. All reports will be followed up. The identity of anyone who makes a report will be kept strictly confidential, unless requested otherwise.



# **Supplier Minimum Standards**

#### 1. Legal Compliance, Integrity and Ethical Conduct

Suppliers must:

- Comply with the law. This includes all legal requirements of the countries in which they operate, manufacture or source goods and services.
- Comply with all anti-bribery, anti-corruption, anti-money laundering, privacy and modern slavery laws.
- Not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.
- Not give, offer, accept or request bribes, facilitation payments, secret commissions, or other improper payments or cause any of them to be given, offered, accepted or requested.
- Maintain adequate records that accurately record 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 is expected to be undertaken without falsification or misrepresentation.
- Conduct themselves in a manner that is fair, ethical and professional.
- Not improperly use any private, confidential or commercially sensitive information in its possession.
- Comply with all applicable Johns Lyng Group policies.

#### 2. Human Rights

Suppliers must:

- Provide goods and services in a manner consistent with any applicable Human Rights obligations.
- Consistent with relevant modern slavery legislation, proactively identify, address and where required by legislation report on risks of Modern Slavery practices in their business operations and supply chains.

#### 3. Forced Labour

- Not engage in, or support the use of, any type of Forced Labour, Bonded Labour, Indentured Labour, or Human Trafficking. This applies to workers directly employed by the Supplier or any third-party providing components, raw materials, labour or services to the Supplier.
- Respect the freedom of movement of their workers and not restrict their movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.



#### 4. Child Labour

Suppliers must:

- Not engage in, or support the use of, Child Labour. This applies to workers directly employed by the Supplier or any third-party providing components, raw materials, labour or services to the Supplier.
- Comply with the minimum employment age limit defined by national law.
- Ensure Young Workers (under the age of 18) do not undertake work which is hazardous or unsafe to their physical and mental health.
- Be able to verify the age of all workers to ensure compliance.

#### 5. Freedom of Association and Collective Bargaining

Suppliers must:

- To the extent permitted by local laws, respect the right of their workers to Freedom of Association and Collective Bargaining. This includes the right to form and join Trade Unions or other worker associations of their own choosing without harassment, interference or retaliation.
- When operating in countries where Trade Union activity is unlawful or where free and democratic trade union activity is not allowed, allow workers to freely elect their own representatives with whom the Supplier can enter into dialogue about workplace issues.

#### 6. Wages, Benefits and Working Hours

Suppliers must:

- Follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance.
- 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. Hiring and Regular Employment

- Provide each worker with a labour contract, which stipulates all legally required employment terms and conditions. The contract should be provided before employment, be in writing, and signed by the workers.
- Not use labour-only contracting arrangements, consecutive short- term contracts, excessive piecework or false apprenticeship schemes to avoid obligations of regular employment to workers.
- Not change or terminate contracts to avoid obligations of regular employment to workers.
- Not charge their workers recruitment or employment fees, or otherwise withhold wages.
- If recruitment agents or labour brokers are used, ensure only legally registered/licensed recruitment agents or labour brokers are used and their engagement is subject to a written agreement which ensures compliance with applicable law and this Code.

#### 8. Migrant Workers

Suppliers must:

- Ensure that migrant workers have the same entitlement as local workers stipulated by local law and under this Code.
- Act with diligence when engaging and recruiting migrant workers, both directly and indirectly, and ensure all foreign migrant workers are legally eligible to work in the country with valid work permits when required.
- Pay any commissions and other fees in connection with employment of migrant workers upfront.
- Not charge back or accept reimbursement from any migrant worker to recover any commissions or fees it has paid to hire migrant workers.
- Not require migrant workers to surrender their identification documents.

#### 9. Discrimination

Suppliers must:

- Provide a working environment where workers are treated fairly and without discrimination.
- Ensure that all conditions of employment are based on an individual's ability to do the job, not on the basis of personal characteristics, such as age, race, ethnicity, colour, nationality, gender, religion, caste, marital or maternity status, sexual orientation, disability or political beliefs.

#### 10. Harassment and Abuse

Suppliers must:

• Not engage in or support any form of Harassment or abuse in connection with workers' employment, including physical, sexual, verbal or visual behaviour that creates an offensive, hostile, or intimidating environment.

#### 11. Health and Safety

- Have knowledge of, and comply with, all local legal regulations on health and safety, including all relevant Johns Lyng Group policies and procedures.
- Complete all required registration, onboarding and induction programs as requested, prior to the commencement of any work.
- Manage occupational health and safety hazards and report all incidents and injuries which occur relating to operations, especially those when undertaking work for Johns Lyng Group.
- Ensure conditions in all operations, work sites, production facilities or worker residential facilities are safe, clean and consistent with all applicable laws and regulations and/or industry best practices, whichever is higher, in order to avoid preventable work-related accidents and injuries.
- Ensure workers are appropriately supervised and trained to perform their jobs safely and receive formal training on health and safety procedures in general.
- Conduct regular monitoring to check that health and safety procedures are being followed.



#### 12. Environment

Suppliers must:

- Ensure all operations are carried out in an environmentally responsible manner and, as a minimum, will meet all relevant local and national environmental protection laws and reporting obligations.
- Ensure all legally required environmental permits, licenses, approvals, and / or other registrations have been obtained and are current.
- Ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- Maintain policies and practices for the efficient use of energy, water and natural resource consumption; and
- Maintain policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.
- In the case of Suppliers of goods, use raw materials and components in manufacturing that, where feasible, have been produced in accordance with the principles of environmental sustainability.

#### 13. Unauthorised Subcontracting

Suppliers must:

- Not sub-contract without prior authorisation.
- Where sub-contracting has been authorised, Suppliers must ensure sub-contractors also comply with the standards of conduct outlined in this Code.

#### 14. Governance and Compliance Management

- Have in place policies and procedures to ensure compliance with applicable laws and this Code.
- Have in place policies and procedures to ensure their own suppliers/authorised sub-contractors comply with the standards of conduct outlined in this Code.
- Develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to labour and Human Rights, health and safety, the environment, business ethics, and corporate governance.
- Perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors.
- Cooperate openly and honestly with any JLG audit, assessment or review.