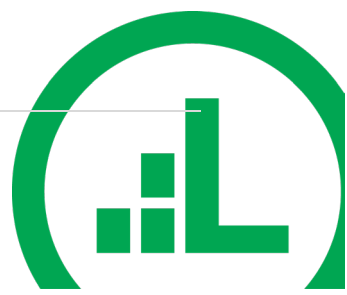


SUPPLIER CODE OF CONDUCT (POLICY)

GOVERNANCE POLICY



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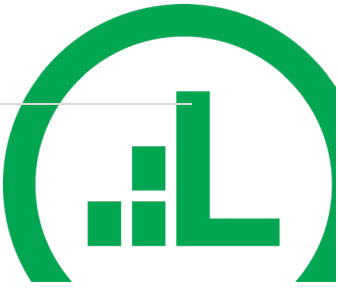
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1. ABOUT THIS POLICY

1.1 Purpose

CoINVEST Limited trading as LeavePlus (**LeavePlus**) is a public company with responsibility for administering the portable long service leave scheme for the Construction Industry in Victoria (**Scheme**) in accordance with the *Construction Industry Long Service Leave Act 1997 (Act)*. LeavePlus is also trustee of the Construction Industry Portable Long Service Leave Fund (**Fund**) from which benefits are paid to workers and working sub-contractors in accordance with the Scheme.

LeavePlus' vision is to be the best operator of a portable entitlement scheme.

Our purpose is to support and protect the long-term wellbeing of construction workers and the vitality of the construction industry.

Our four values are: Here for Members; Thrive Together; Empower our People; and Anticipate and Create.

Suppliers are an integral part of LeavePlus' business, working with us to be our best and supporting us to deliver against our objectives. It is essential that suppliers share our values, principles and commitments and this Supplier Code of Conduct (**Code**) sets out the minimum requirements for suppliers in seeking to do business with LeavePlus.

1.2 Scope

The Code applies to all Suppliers doing business or seeking to do business with LeavePlus.

1.3 Ownership and further information

The Chief Legal and Compliance Officer is responsible for developing and communicating the Code.

Employees who engage Suppliers are responsible for providing a copy of the Code to potential Suppliers prior to them being engaged and to existing Suppliers. Without limitation, a copy of the Code must be included in any request for tender (or similar) issued on behalf of LeavePlus.

A copy of the Code will also be published on LeavePlus' external website for reference by Suppliers or potential Suppliers.

1.4 Review and approval

This policy will be reviewed every two years and approved by the Board.

Version	Policy Owner	Reviewer	Comments	Approved		Next review date
				By	Date	
3.0	Board	ARC Committee	Remove reference to COVIDSafe Plan since this is now part of the OHS Risk Register (infectious diseases)	Board	25/11/2025	Nov-27
2.0	Board	ARC Committee	Update to LeavePlus format and change to review period	Board	14/11/2023	Nov-25



1.0	Board	ARC Committee	Initial adoption of the Supplier Code of Conduct	Board	December 2022	Dec-23
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2. BACKGROUND

LeavePlus is committed to ethical, sustainable, and socially responsible procurement and we expect the same high standards of our Suppliers. We view our Suppliers as partners and we care about the way they do business when providing goods or services, including construction works and services, to LeavePlus.

The Code describes the minimum expectations in the areas of: integrity, ethics and conduct; conflict of interest, gifts, benefits and hospitality; corporate governance; labour and human rights; health and safety; and environmental management.

Suppliers to LeavePlus are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

3. APPLICATION OF THE CODE

LeavePlus seeks to work with its Suppliers to meet and exceed minimum expectations as outlined in this Code and continuously strives to improve the standard of its business practices.

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. Fundamental to this Code is an expectation that all Suppliers 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 Supplier's regulatory and contractual obligations. Suppliers 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.

LeavePlus expects Suppliers to communicate the Code to their related entities, Suppliers and subcontractors who support them in supplying goods and services to LeavePlus, so that they are aware of, understand and comply with the Code.

4. CORRECTIVE ACTION PROCESS

Suppliers 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.

Suppliers are encouraged to raise any concerns about any of the standards in the Code with their LeavePlus contract manager. LeavePlus aims to work with Suppliers to develop and implement corrective action plans where possible. However, serious breaches or continued non-compliance with the Code may lead to LeavePlus ceasing the purchase of goods and services from such Suppliers.

If requested by LeavePlus, Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance.

5. PART A: LABOUR AND HUMAN RIGHTS

LeavePlus considers that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business.



5.1 Anti-discrimination

LeavePlus expects Suppliers to promote a diverse and inclusive workplace free from unlawful discrimination against any worker based on age, disability, ethnicity, gender, marital status, medical or irrelevant criminal record, political views or affiliation, pregnancy or potential pregnancy, race, social origin, carers' responsibilities, religious beliefs or activity, sexuality or sexual orientation, gender identity, union membership, or any other status protected by law.

In line with this, LeavePlus prefers Suppliers who promote diversity in their supply chain, including:

- (a) Those with strong female gender representation, that improve gender equality, that actively promote women and seek to address gender pay equity gaps;
- (b) Those who publicly commit to First Nations procurement targets or engage with social enterprises;
- (c) Those that initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged.

5.2 Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, sexual harassment, victimisation, and abuse. Suppliers are expected to take reasonable and proportionate measures to eliminate such behaviour from its workplace and supply chain.

Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual, or psychological.

5.3 Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Consistent with relevant modern slavery legislation, Suppliers are expected to proactively identify, address and, where required by legislation, report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

5.4 Prevention of involuntary and underage labour

Suppliers are expected to:

- (a) ensure that all work is undertaken without coercion;
- (b) not use any form of forced, bonded or indentured labour; and
- (c) employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. Suppliers are therefore expected to:

- (a) use all reasonable endeavours to ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and applicable law; and
- (b) be responsible for payment of all recruitment related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

5.5 Working hours, wages, and benefits

Suppliers must:

- (a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;



- (b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements (including long service leave) and time off for legally recognised holidays;
- (c) where applicable, be registered with LeavePlus and pay long service leave charges to LeavePlus in accordance with the *Construction Industry Long Service Leave Act 1997* (Vic) (**CILSL Act**) and the Rules of the Construction Industry Long Service Leave Fund. Suppliers must take reasonable steps to ensure that all covered workers, working sub-contractors and employers in their supply chain are also registered with LeavePlus; and
- (d) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. Suppliers are expected to pay equal pay for equal work. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable law; and
- (e) provide fair working conditions for their employees, including adequate rest breaks, sufficient leave, freedom of association and collective bargaining in accordance with relevant laws.

6. PART B: INTEGRITY, ETHICS AND CONDUCT

LeavePlus expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing, and operations.

6.1 Business integrity

Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering, taxation and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative, or collusive activities.

Suppliers must strictly follow all relevant competition laws and promote fair behaviour towards other businesses and consumers.

Suppliers are expected to ensure the protection of whistle-blowers.

6.2 Conflicts of interest

Suppliers must declare and where possible avoid, any actual or potential conflicts of interest in dealings with LeavePlus.

6.3 Gifts, benefits, and hospitality

LeavePlus employees are expected to conduct themselves with the highest standards of integrity. This includes appropriate handling of offers of gifts, benefits, and hospitality. Employees are required to refuse offers of a non-trivial nature made by suppliers unless there is a legitimate business purpose for accepting the offer and the offer does not otherwise give rise to a conflict of interest.

In line with this position, Suppliers are expected to refrain from making offers of gifts or benefits to LeavePlus employees unless there is a legitimate business benefit to LeavePlus and the offer is otherwise reasonable and appropriate (such as an offer to attend a business update which is offered generally to the customers of the Supplier) and any hospitality offered should be limited to offers of basic courtesy (such as tea or coffee during a meeting) or otherwise reasonable, appropriate and for legitimate business purposes only.

Without exception, no offers must be made by Suppliers to LeavePlus employees or contractors in connection with or while the Supplier is engaged in any procurement process for the supply of any goods or services to LeavePlus.

6.4 Record keeping and documentation

Suppliers are expected to 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.



6.5 Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring LeavePlus into disrepute.

6.6 Confidentiality

Suppliers must not improperly use any private, confidential, or commercially sensitive information in its possession relating to or in connection with its dealings with LeavePlus.

6.7 Data Privacy

Suppliers are expected to strictly comply with data privacy and regulatory requirements including but not limited to the Privacy Act and LeavePlus Supplier Information Security Policy when personal information is collected, stored, processed, transmitted, and shared. If a Supplier holds identifiable personal information on behalf of LeavePlus, the Supplier must immediately advise LeavePlus of any actual or suspected data breach in relation to that personal information.

7. PART C: CORPORATE GOVERNANCE

Commitment to sound management administration, risk and corrective action systems, are key to a reliable supply chain for LeavePlus. Suppliers are expected to maintain sound administration processes.

7.1 Risk assessment and management

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include cyber and data privacy risks, supply chain risks and risks relating to labour and human rights (including modern slavery in supply chains), health and safety, the environment, business ethics, and corporate governance.

7.2 Critical incident management

Suppliers should:

- (a) identify and assess potential critical incident, emergency situations and business continuity risks; and
- (b) develop and implement emergency plans and response procedures that minimise harm to life, data, environment, and property, while minimising disruption to business continuity.

8. PART D: WORKPLACE HEALTH AND SAFETY

Worker health, safety and well-being is of paramount importance to LeavePlus. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into their businesses.

Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

- (a) manage occupational health and safety hazards;
- (b) provide workers with job-related training and consult with employees in relation to the provision of information and training;
- (c) implement written health and safety policies and standards;
- (d) develop and implement documented systems to identify and record work-related injuries and illnesses; and
- (e) adhere to LeavePlus' health and safety policies and procedures at LeavePlus' premises.



9. PART E: ENVIRONMENT AND SUSTAINABILITY

LeavePlus is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

At a minimum, Suppliers are expected to:

- (a) comply with all relevant local and national laws and regulations on environmental management and reporting;
- (b) consider a documented commitment to environmental objectives;
- (c) consider the design, development, manufacture, packaging and delivery of goods and/or services in terms of both their sustainability and long-term impact on the environment; and
- (d) strive to reduce environmental harm by maximising the efficient use of natural resources, energy, water and raw materials and minimise pollution (inclusive of greenhouse gases pollution) and waste.

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