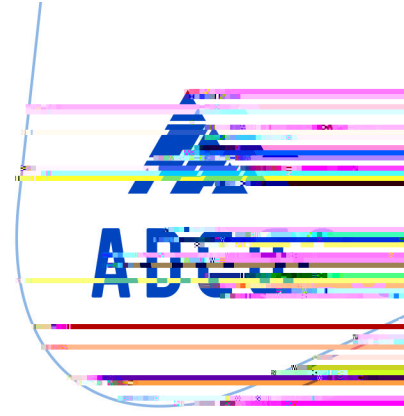


SUPPLIER CODE OF CONDUCT



Our commitment

ADCO is committed to operating with integrity and to the highest ethical standards. We are conscious of the responsibilities we bear towards our clients, employees and the communities in which we work. We follow a strict set of ethical standards to guide us in our business dealings and we expect that the same high standards

or other improper behaviour to ADCO;

reasonable endeavours to ensure that your main acts consistently with this Code.

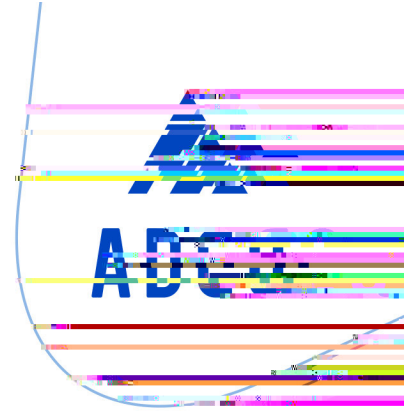
Work Health and Safety

The health, safety and well-being of people employed at work, or people affected by our work, is paramount when work is being performed either by ADCO or on our behalf.

As a Trade Partner, you must ensure health and safety is maintained by:

- a. Complying with all applicable health and safety laws, regulations and applicable codes and standards to ensure a healthy and safe work environment, the well-being of employees, and to prevent incidents of injury, near miss and work-related illness;
- b. Complying with the ADCO Health Safety Environment (HSE) Requirements provided at Tender, our HSE Management System (MS) and applicable standards for our enterprises, local suppliers and supplier diversity;
- c. Waste avoidance strategies;
- d. Procurement and use of products, materials or processes that support reduced Green House Gas emissions; and
- e. Engagement in the emerging transition of key materials to low embodied carbon alternatives.
- f. Reporting on emissions data to assist ADCO in its disclosure of climate-related financial information.

SUPPLIER CODE OF CONDUCT



Conflicts of Interest

ADCO aims to ensure that its workers, supervisors, managers and directors are aware of their obligations to identify and disclose any conflicts of interest and to ensure that those conflicts are appropriately managed. You must similarly comply, disclosing any actual or potential conflict of interest with ADCO personnel.

Conflict of interest situations may include a family relationship, partnership, business relationship, business partnership or investment.

Anti-Corruption

As a Trade Partner you must:

- a. Comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards;
- b. Not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official or act to secure improper advantage in order to obtain or retain business;
- c. Comply with applicable laws and regulations designed to combat money laundering activities and maintain financial records and reports according to international laws and regulations; and
- d. Take reasonable steps to ensure you have appropriate policies and safeguards in place to prevent corruption, bribery or anti-competitive behaviour.

Business continuity

As a Trade Partner, you must be prepared for any disruptions to your business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases, worker shortages). This preparedness especially includes business continuity and disaster recovery plans to protect both employees and the environment, as far as possible, from the effects of possible disasters that arise within the scope of your operations.

Reporting

Any employee or other worker who believes they have been subjected to any conduct inconsistent with this Supplier Code of Conduct, should report it immediately to an ADCO workplace representative verbally or in writing. A number of reporting options are available to employees of Trade Partners including:

- notification to an ADCO Connector identified at a specific workplace; or
- completion of a Notification of An Issue form available at ADCO projects and provide the completed form to an ADCO workplace representative or anonymously via the project site mailbox.

Our contact

As a Trade Partner, you are essential to us achieving our commitment to integrity and maintaining the highest ethical standards.

Thank you for your support of this Code. If you have any queries about the Code or wish to raise any issues of concern, please contact our State Manager, whose details are available on our website:

adcoconstruct.com.au.



Neil Harding
Managing Director