Supplier Code of Conduct

JOHN HOLLAND

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How to report a breach of this Code

If you are concerned about a suspected or actual breach of this Code, you can report your concerns to us using our John Holland Speak Up Line. You can use our Speak Up Line if you are a supplier to us or if you work for one of our suppliers or their subcontractors.

Our Speak Up Line is independent and you can contact the Speak Up Line anonymously. We do not tolerate any punishment or retaliatory action being taken against anyone who raises a genuine concern through our Speak Up Line.

You can contact the John Holland Speak Up Line via the following:

- **For Australia:** 1800 775 126
- **For New Zealand:** 0800 788 612
- **For Singapore:** 800 616 7117
- **By email:** johnhollandspeakup@pkf.com.au
- **Website:** https://www.pkftalkintegrity.com/?jhg

Our Values

Caring
We care deeply about what we do and how it affects lives.

Empowering
We gain trust through action.

Imaginative
We push the boundaries.

Future-focused
We're in it for the long, long term.

CEO message

Our purpose at John Holland is to transform lives.

We think deeply about what we do and how it affects people and our planet, and this informs how we deliver the infrastructure, buildings and railways that we have been entrusted to build.

Our suppliers are key to us achieving our purpose. We value our supplier relationships and expect the same high standards from our suppliers as we do from ourselves.

As a supplier to John Holland, this Supplier Code of Conduct clearly explains our expectations for how you work with us. It is important you ensure you understand and meet these expectations.

Our door is always open and our people are always here to discuss our expectations with you and any questions or concerns you may have.

We look forward to working with you.



Nick Miller
Chief Executive Officer

01

Using the Code

As one of Australia's leading infrastructure companies, we are committed to operating sustainably and ethically. This includes embedding respect for people and for the environment around us across our business activities and relationships. As a supplier to John Holland, you play a key role in supporting us to meet this commitment.

This Code explains our expectations of you, your subsidiaries and your supply chain, and applies to every organisation or individual that provides John Holland with goods or services. We expect you to provide your workers with appropriate training and support to enable them to comply with this Code. We also expect you to set clear expectations for your own suppliers that align with this Code.

This Code sets a minimum standard. We encourage you to show leadership by going beyond the standards in this Code.

Where this Code contains higher standards of behaviour than local laws, rules, customs or norms, the higher standards in this Code will apply. Should national laws conflict with the standards in this Code, we will work to encourage adoption of relevant international standards.
If you have questions about this Code and our expectations, please contact:
corporate.reception@jhg.com.au

Not sure what to do - quick test?

Try this quick test when making a decision:

Expectations
Is it lawful and is it in Line with the expectations in this Code?

Safety
Could it directly or indirectly endanger someone or cause them injury?

Feelings
Would you be happy if you were treated this way?

Reasons
Do you have all the information that is necessary to make a sound decision and would you feel confident explaining your actions to John Holland, your own management or external authorities?

Reputation
What would your family, colleagues or business partners say about the decision you are about to make? How would you be impacted if your decision was reported in the media?

01

Compliance and reporting breaches

Breaches of this Code will be investigated by us. We will take appropriate action to address substantiated breaches of this Code, which may include requiring corrective action from suppliers. We may also suspend or terminate the supplier relationship, including in cases of repeated or serious breaches.

We monitor our suppliers' compliance with the Code, and may review or audit your compliance at any time.

You must also immediately disclose to us any actual or suspected breaches of this Code by you, your subsidiaries or supply chain. This includes any allegations made by third parties.

You should also report to us any concerns about our other suppliers that may be in breach of the Code. This can be done anonymously through our independent Speak Up Line. The information on page 2 explains how to use our Speak Up Line.

John Holland expects its suppliers to promptly report and appropriately manage allegations or instances of criminal or unlawful conduct and to comply with all applicable legal, contractual and regulatory obligations. Suppliers must preserve relevant evidence, cooperate with regulators and authorities, maintain appropriate records and implement processes to support compliance.

Where specific government requirements apply, including the Victorian Government's Reporting Criminal and Unlawful Conduct on Public Construction Projects Policy, suppliers must comply with those requirements.



02

Safe, free & fair work

We expect our suppliers to respect workers' human rights[1], including by providing safe, free and fair workplaces, as outlined below. Respecting human rights means that we expect you to take all appropriate action to do no harm to workers or other people you could impact through your own activities or business relationships. This includes making sure you provide access to trusted and safe places where workers can raise complaints about their treatment, and where necessary seek an appropriate remedy.[2]

As our supplier, we require you to:

- Treat all workers fairly and with respect.
- Prioritise workers' health and safety and take all practicable steps to proactively prevent workplace health and safety incidents, including complying with all relevant local, national and international health and safety laws, regulations and standards and complying with all John Holland site-specific safety requirements.
- Take proactive steps to ensure work environments are free from unacceptable workplace behaviour such as harassment[3], unlawful discrimination, bullying, vilification, occupational violence, victimisation, unlawful industrial conduct, corruption, theft, vandalism and other criminal or unlawful behaviour within the workplace or supply chain or other inappropriate workplace behaviour.
- Ensure fair remuneration and working conditions for all workers (including equal pay for equal work), including by respecting workers' rights to bargain collectively and form and join trade unions.
- Make all efforts to create gender equality, comply with the Workplace Gender Equality Act 2012 (Cth) and look for opportunities to boost equality within your business. This includes working towards gender equality in remuneration, training and development, and career pathways.
- Prohibit the use of modern slavery (including forced labour) and child labour in your operations and supply chains and take proactive steps to manage potential risks.
- Respect workers' privacy and treat personal information as being of utmost importance, including by complying with all applicable privacy laws, regulations, standards and contract obligations in relation to the collection, storage, use and disclosure of such information.
- Provide means for workers to safely and anonymously make complaints relating to unsafe or unfair working conditions (including modern slavery or other exploitation). Workers must not be exposed to retaliation or fear of retaliation for making a complaint.
    - You can do this either by establishing your own effective reporting mechanism that is trusted, accessible and legitimate, or (where appropriate) promoting the John Holland Speak Up Line to workers involved in work undertaken as part of our relationship with you (page 2 explains how to contact the Speak Up Line).

[1] Internationally recognised human rights are set out in the Universal Declaration of Human Rights and core international standards setting out what they mean for business. John Holland follows these standards, including the UN Guiding Principles on Business and Human Rights.

[2] As explained in this section, this could include either establishing a reporting mechanism for your workers and subcontractors to make complaints or promoting the John Holland Speak Up Line.

[3] John Holland Sex Discrimination and Sexual harassment Policy.

03

Ethical business practices

We expect our suppliers to act ethically and lawfully at all times.

As our supplier, we require you to:

- Provide us with true and correct information and never knowingly provide us with incorrect or misleading information. This includes maintaining accurate and auditable accounts and records.
- Not engage in any form of bribery or corruption, including making or accepting facilitation payments[3] (including where permitted under local laws).
- Cash payments should be avoided unless expressly permitted by law, supported by legitimate business purposes, appropriately approved, fully documented and accurately recorded in the supplier's books and records. Off-book accounts, false, misleading or incomplete records, and untraceable payment arrangements are strictly prohibited.
- Immediately report to us any requests for bribes or improper payments in relation to work undertaken as part of our relationship with you.
- Not request a gift or hospitality of any kind from a supplier or other business partner, and exercise care when giving or receiving gifts or entertainment to avoid any perception that these may unduly influence business decisions or create conflicts of interest in relation to work undertaken as part of our relationship with you (such as a decision to hire a specific subcontractor).
- Comply with all relevant legislation, regulations, international standards and contract obligations, including relating to anti corruption, sanctions and fraud.
- Avoid any activities or commitments that may cause reputational damage to John Holland through our relationship with you.
- Not use any confidential information[4] about John Holland, a competitor, joint venture partner, customer or supplier for financial or other personal benefit, or convey this information to others before it is made public.
- Not engage in anti-competitive conduct, such as price-fixing, cartel conduct or exclusive dealing.
- Not use a third party to do something that you are not permitted to do yourself (unless legally allowed), including the requirements set out in this Code.
- Immediately notify us of any actual or suspected data breaches in relation to data held by you (or a third party) connected to work undertaken as part of our relationship with you.

[3] Facilitation payments are typically payments involving small sums to an individual within government, or other public authority, or within a private entity to obtain routine services that are related to obtaining an undue advantage.

[4] Confidential information can include: information about company contracts with John Holland; the financial performance of John Holland's projects against budget; proposed mergers, acquisitions or joint ventures related to John Holland; and other information that is not available to the general public.

04

The environment

We expect our suppliers to do business in a manner that respects natural resources and the broader environment.

As our supplier, we require you to:

- Comply with all relevant local, national and international environmental laws, regulations, standards and contract obligations.
- Seek ways to minimise the use of natural resources (including energy and water) and impact on the environment, including by reducing, reusing or recycling goods and minimising chemical use and air pollution.
- Take all practicable steps to proactively prevent involvement in adverse environmental impacts, including by establishing a documented environmental management system where appropriate.
- Address any adverse environmental impacts that do occur, including by immediately stopping any work that is causing or exacerbating the impacts, and taking other necessary action.
- Immediately report any environmental impacts to us where the impact relates to work undertaken as part of our relationship with you.
- Encourage your contractors, suppliers, business partners and other third parties to also engage in responsible business practices that respect the environment.



05

The community

We expect our suppliers to respect the communities where they operate. This includes working to identify, prevent and address any adverse social (including human rights) impacts[5] with which you may be involved through your activities or business relationships.

As our supplier, we require you to:

- Respect the interests and human rights of local communities where you operate including communicating and consulting with local communities affected by your operations.
- Work with relevant community stakeholders, especially those most affected by your operations, to identify and address their concerns and expectations.
- Be sensitive to the different cultures, languages and religious beliefs of the communities in which you operate and pay particular attention to potential or adverse impacts on at-risk or vulnerable groups.

We also encourage you to consider opportunities to support these communities, including by exploring and giving opportunities in procurement arrangements to small and medium enterprises, Indigenous businesses, social enterprises, and disadvantaged groups.

[5] The social (including human rights) impacts that may be most relevant to communities could include impacts relating to land usage and access; the protection of cultural heritage; the protection of Indigenous Peoples' rights and the impact on access to basic services like health and education services for communities because of the influx of workers into an area.

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