



Standards of Business Conduct

Buildcorp



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Buildcorp

BUILDING
SAFELY
FOR OVER

25

YEARS

Buildcorp

BUILDING
SAFELY
FOR OVER

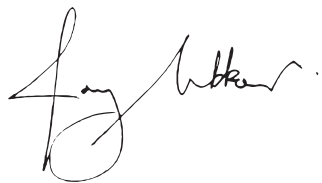
25

YEARS

The Buildcorp way

As a family-owned construction business built on values, Buildcorp's difference comes from who we are and what we stand for. Since 1990 Buildcorp's teams have grown across Australia's east coast to create a \$500 million business. However, we measure ourselves, not just on financial performance, but how we treat our people, partners and community – and the supportive, ethical approach we bring to every business relationship.

The collective, collaborative attitude of our people is Buildcorp's real difference, and it comes from the values, conduct principles and policies outlined in this document. Together, these foundational commitments have driven almost 30 years of success, giving us: passionate staff, loyal customers, industry-leading systems, award-winning projects, supportive suppliers and a reputation to be proud of.



Tony Sukkar, AM
Managing Director



Josephine Sukkar, AM
Principal

Our values

When you work with Buildcorp, you see our values in action every day. From a Project Manager proudly handing over defect-free, to a Site Supervisor pro-actively ensuring their team gets home safe, to our men and women working in balanced teams to find the right solutions for our clients.

Our values are genuine and closely held because they were defined by our people.

They reflect our collaborative culture and our '**we're with you**' commitment to our clients.



Teamwork

We're with you,
on the same team.



Creative Thinking

We're with you, with a
curiosity to find a better way.



Preparedness

We're with you, when you
need us most.



Passion

We're with you, because that's
exactly where we want to be.



Fair Play

We're with you, because
you're with us.



Continual Learning

We're with you, understanding
why and learning.



Social Responsibility

We're with you, and together
we can give more.

The Buildcorp code of conduct

While we start by ensuring our policies align with federal and state laws and regulations, our culture drives us to create a conduct framework that goes well beyond this.

We strive for global best practice standards, guided by our values, to ensure we are doing the right thing for our people, partners, projects and wider community.

Buildcorp uses the following policies to give our people clear directions for upholding our values and standards of business conduct.





Ethics



Ethics

At Buildcorp, we are honest and demonstrate integrity in every aspect of our strategy planning, business decisions and actions as we engage with colleagues, customers, suppliers and members of the community.

Anti-bribery and corruption policy

Buildcorp maintains a high standard of integrity and professionalism to sustain our reputation and earn our clients' trust. This includes preventing collusive tendering practices and ensuring employees do not offer or accept gifts that could compromise their integrity and objectivity in performing their duties.

We maintain our ethical standards by:

- ▼ Having zero tolerance for employees giving, offering, promising, accepting, requesting or authorising a bribe as part of a tendering process, or in any other business activity
- ▼ Conducting periodic reviews to provide assurance that internal controls are effective in countering bribery and corruption, especially in tendering processes
- ▼ Keeping financial records and have appropriate internal controls in place to evidence the business reason for making any payments to third parties
- ▼ Preventing accounts from being kept 'off book'
- ▼ Requiring employees to declare all gifts and benefits, valued at \$500 or more
- ▼ Performing regular reviews of the register to identify and manage any emerging risks

Anti-slavery policy

Buildcorp believes that all employees and all workers should be subject to the virtues of freedom and liberty and that Modern Slavery and other forms of abuse are direct violations of basic human rights and the law. We make sure the goods and services we purchase through our supply and value chains are ethical and minimise or eradicate Modern Slavery risks.

To do this we:

Examine and consider the integrity of the potential supplier, including the original source of the product and whether there is the risk of any harmful labour practices or human exploitation based on the industry, location of the supplier or other factors.

Ensure that procurement is clearly documented so we can demonstrate that decisions and purchases were made in accordance with our procurement policies and all applicable laws.

We also require our suppliers to:

- ▼ Comply with all applicable Australian and international Modern Slavery legislation
- ▼ Notify Buildcorp of any breaches of such laws
- ▼ Never employ children under the legal age of employment in any country or local jurisdiction
- ▼ Never use any form of forced, bonded or involuntary labour
- ▼ Comply with all national laws and mandatory industry standards regarding working hours, overtime, wages and benefits
- ▼ Allow their employees to join or not to join a union of their choice, free from threat or intimidation
- ▼ Promote an inclusive work environment that values the diversity of its employees
- ▼ Maintain high standards of occupational health and safety

Responsible procurement policy

Buildcorp works in partnership with our suppliers to ensure the goods and services we purchase through our supply chain not only deliver value for our business and our clients, but are ethical, environmentally sustainable, create business relationships free from conflicts of interest and are consistent with our commitment to fair opportunity.

Our responsible procurement practices include:

- ▼ Making procurement decisions that consider more than price and profit alone, but also ethical, environmental and social factors that minimise risks to our business and maximise the potential for our procurement relationships to achieve environmental and social benefits
- ▼ Ensuring all materials comply with Australian Standards
- ▼ Ensuring our suppliers and subcontractors comply with all applicable Australian and international laws in relation to prohibited business practices and to support internationally accepted standards, treaties and declarations
- ▼ Preventing our supply chain from being complicit in: money laundering, financing terrorism, violations of human rights, breaches of privacy and data protection obligations, violations of trade and import rules or other prohibited and unethical practices
- ▼ Using sustainability criteria when awarding contracts, including asking potential suppliers to identify and price products and services that meet Buildcorp's environmental criteria
- ▼ Seeking expressions of interest from suppliers whose businesses can achieve positive social outcomes
- ▼ Sustaining Buildcorp's safety standards by incorporating risk management activities into purchasing processes to prevent new hazards from being introduced into the workplace or to control them
- ▼ Engaging subcontractors and suppliers who have no conflicts of interest with Buildcorp's employees
- ▼ Requiring all suppliers to sign Buildcorp's Supplier Code of Conduct

Whistleblower policy

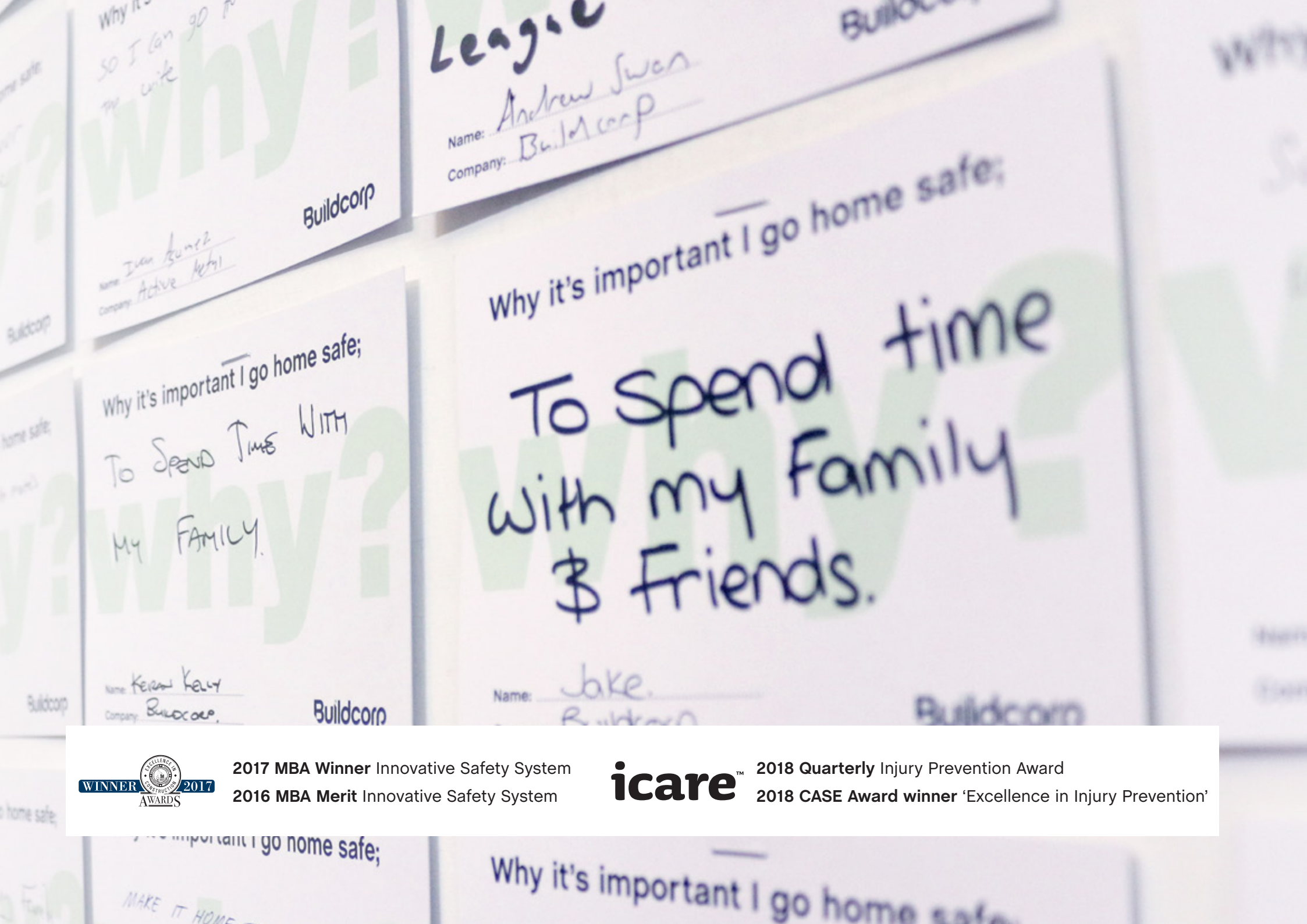
To ensure high standards of professional and ethical workplace conduct and practices, Buildcorp believes it is vital that employees can raise genuine concerns about conduct, activities or practices without fear of reprisal.

To create an environment where people can come forward with confidence, we:

- ▼ Offer employees a confidential means of raising concerns if they witness:
 - violations of Buildcorp's policies;
 - other employees disregarding the health and safety of others or the environment;
 - criminal behaviour, including theft, drug use/sale, actual or threatened violence and damage to property;
 - ethical violations and conflicts of interest;
 - breaches of any applicable legislation or contractual responsibilities;
 - or employees condoning or concealing any of these behaviours
- ▼ Take seriously and thoroughly investigate reports, even if the whistleblower cannot provide evidence
- ▼ Keep the allegation, its discloser and all details of the investigation itself confidential
- ▼ Have zero tolerance for any victimisation, harassment, retaliation, demotion or adverse employment consequences for whistleblowers who act in good faith and without malice
- ▼ Take appropriate disciplinary action if allegations are found to be true, including termination and referring the matter to appropriate law enforcement agencies

The background of the image features a solid green color. Overlaid on this are two stylized, light green outlines of gloves. Each glove has five fingers and a wrist strap. On the back of each hand, there is a small, light green exclamation mark. The word "Safety" is written in white, sans-serif font, centered over the right glove.

Safety



2017 MBA Winner Innovative Safety System
2016 MBA Merit Innovative Safety System

icare[™]

2018 Quarterly Injury Prevention Award
2018 CASE Award winner 'Excellence in Injury Prevention'

Safety

Buildcorp's mission is to ensure that everyone, on every site, goes home safe, every day. To achieve this, Buildcorp's safety approach goes beyond the standard industry measurements to put safety management into action. The safety system is built from a foundation of continual improvement and considers WHAT we measure, WHERE we can mitigate risk (specific to each project), WHY it's important to ensure each other's safety and a measurement of HOW proactive our projects are at implementing the system.

Workplace health and safety policy

This proactive, safety-first culture keeps safety at the front of everybody's mind and ensures compliance with relevant legislative standards. Thanks to this, our safety systems are accredited by the Federal Safety Commissioner (FSC) and have been recognised with industry awards from the Master Builders Association and icare NSW.

Every day, we:

- ▼ Use the Buildcorp Health and Safety Management System to identify hazards on all projects before starting work and consult and coordinate with everyone working on site
- ▼ Educate those working on a Buildcorp site about the relevant safety systems
- ▼ Ensure adherence to these safety systems is a first priority for all
- ▼ Consult freely and effectively with site workers to ensure we address their safety concerns
- ▼ Escort all site visitors for their safety
- ▼ Keep training current and compliant with regulatory standards
- ▼ Capture, report and analyse safety data to identify corrective actions and improve our health and safety performance
- ▼ Identify proactive safety ideas for system improvements

Rehabilitation policy

Should any Buildcorp employee sustain a work-related injury or illness, our aim is to provide them with all the support necessary to ensure their safe and early return to work, in a way that will facilitate their best possible recovery.

We make this happen by:

- ▼ Helping injured or ill employees to return to work as soon as it is safe to do so
- ▼ Providing information and support to assist injured or ill employees to return to work
- ▼ Determining the needs of injured or ill employees by liaising with them, the nominated treating doctor, union representatives and our workers' compensation insurance provider
- ▼ Providing early access to rehabilitation services
- ▼ Developing, implementing and monitoring injured or ill employees' return to work plans in conjunction with them, their manager, our workers' compensation insurance provider, the nominated treating doctor and any approved workplace rehabilitation providers
- ▼ Providing suitable alternative duties for injured or ill employees as an integral part of their rehabilitation and return to work process
- ▼ Consulting with injured or ill employees and their representatives help the process to operate effectively
- ▼ Providing injured or ill employees with workers' compensation claims information

The background is a solid green color. Overlaid on this are several thick, light-green, abstract lines that form organic, flowing shapes. These shapes resemble stylized leaves or branches, with some having pointed tips and others being more rounded. The lines are layered, creating a sense of depth and movement. The word "Environment" is centered in the middle of the image, written in a white, sans-serif font.

Environment



Environment

As a builder, understanding and managing the environmental impact of our business is fundamental to our long-term success.

Environmental policy

Buildcorp meets its responsibilities to the environment through preventing pollution and minimising the impact of waste, air emissions, erosion, water pollution and noise associated with our sites on the local community, flora and fauna. We use a comprehensive Environmental Management System that is certified to AS/NZ ISO 14001 to support a culture of proactive environmental management.

When it comes to the environment, we:

- ▼ Conduct our activities in accordance with legislative requirements, global best practice guidelines, our company policies and our internal Health, Safety and Environment initiatives
- ▼ Make protecting the environment a high priority as projects are planned, designed and constructed
- ▼ Use the Buildcorp Environmental Management System to identify hazards on all projects before starting work, and create and communicate appropriate risk management programs
- ▼ Provide sufficient supervision and training to ensure environmental procedures are followed and Buildcorp systematically identifies and controls environmental risk and hazards
- ▼ Educate our staff on the importance of environmental preservation
- ▼ Communicate any significant environmental incidents to our staff and senior management
- ▼ To ensure that our environmental management is sustained as a major priority, by committing to a proactive system of design, implementation and review to bring about continual improvement in our systems

Built environmental sustainability policy

Buildcorp also embraces sustainability in the built environment. We are experienced and passionate about constructing and refurbishing assets with a diverse range of accreditations from NABERS, Green Star, LEED and WELL. Our Sydney head office was awarded CitySwitch Green Office Signatory of the Year in 2013. We also have a strong track record in helping our clients to achieve their sustainability project goals.

Our built environmental sustainability commitments require us to:

- ▼ Support and encourage clients seeking sustainable building practices
- ▼ Investigate practical opportunities to minimise waste of raw materials, energy and water
- ▼ Promote and support the use of innovative leasing and reuse/take-back schemes
- ▼ Reuse and recycle demolition waste to divert it from landfill
- ▼ Work with subcontractors and suppliers to develop domestic reprocessing capabilities
- ▼ Seek continual improvement to deliver more sustainable construction processes within our control
- ▼ Keep abreast of sustainability innovation and train our teams accordingly
- ▼ Be an active member of the Green Building Council of Australia, which we have supported since 2007
- ▼ Train our staff and support clients to achieve suitable accreditations and certifications with NABERS and the Green Building Council of Australia
- ▼ Share best practice learnings in sustainable design and construction with others in the industry
- ▼ Endeavour to establish greenhouse gas emissions reporting in line with ISO 14064-1 :2018

The background is a solid green color. Overlaid on this are three stylized, light green line-art figures of people. The figures are composed of simple, thick lines. The figure on the left is partially cut off by the edge. The figure in the center is more complete, showing a head with a wavy line for hair and a torso with a simple cross-like shape. The figure on the right is also partially cut off. The word "People" is written in white, sans-serif font, centered horizontally and slightly to the right of the center figure.

People



**EMPLOYER
OF CHOICE
WINNER 2018**

People

Buildcorp aims to attract, support and develop the best talent in the market. To do this, Buildcorp empowers and engages our people and leaders with tools, systems and opportunities to support them to drive their career and connect to the business. This approach has helped us win an Employer of Choice Award from the Australian Business Awards and is one of the reasons why our employee satisfaction rates remain consistently high.

Diversity policy

Buildcorp recognises that an inclusive and diverse workforce is an important issue in the workplace. It is also a sound management practice that helps us attract and retain a high-quality workforce.

To create a diverse and collaborative culture, we:

- ▼ Have a zero-tolerance culture for unlawful discrimination, bullying or harassment
- ▼ Treat all complaints of discrimination, harassment, victimisation or bullying seriously and as confidentially as possible
- ▼ Take disciplinary action where appropriate in relation to a breach of this policy, up to and including termination of employment
- ▼ Make appointment, promotion, remuneration and career development decisions based on an individual's skills, abilities and relevant performance record
- ▼ Address any matter raised that does not comply with our Diversity Policy as quickly and sensitively as possible

Indigenous participation policy

Buildcorp supports Aboriginal and Torres Strait Islander (Indigenous) people to fully participate in, and benefit from, the economic advantages enjoyed by all Australians. We undertake these activities, not to tick a box, but because it is the right thing to do, ensuring our workforce reflects the country in which we operate. Our focus is on increasing sustainable employment opportunities for Indigenous people within Buildcorp, including at senior management levels. We also employ Indigenous partners in our supply chain and actively establish new pathways for Indigenous people to participate in the construction industry.

To achieve these goals, we:

- ▼ Proactively encourage Indigenous employment via paid work experience, cadetships, permanent job placement and labour hire within Buildcorp
- ▼ Increase Buildcorp's engagement with Indigenous enterprises and work with them to develop skills for the construction industry
- ▼ Engage with the First Australians Chamber of Commerce and Supply Nation
- ▼ Support Indigenous education and training pathways into the construction industry
- ▼ Use protocols to guide our employees to ensure their work acknowledges and respects Indigenous cultural beliefs and practices

Learning and development policy

“Continual Learning” is a core value at Buildcorp. Developing our people is essential if we are to have the skills and capabilities we need to succeed, deliver high performance for our clients and ourselves in a sustainable manner and mitigate business continuity risks by having a pool of skilled internal candidates.

Our approach to continual learning includes:

- ▼ Providing appropriate and timely training to meet health, safety, quality, environmental and other legal responsibilities, and to ensure legislative compliance in all areas of the business
- ▼ Provide tools and support for our people to understand possible career pathways and the competencies they need to develop to get there

- ▼ Enhancing each individual's soft and technical skills and abilities to support career progression and diversification
- ▼ Managing training and development costs prudently to ensure any investment delivers value and outcomes
- ▼ Maintaining timely and accurate records of employee training achievements and make aggregate statistical training data available to interested third parties

Industrial relations policy

Thanks to our supportive culture and ethical approach, Buildcorp has an enviable industrial relations record and excellent relationships with our employees and industrial organisations. We work actively to protect the safety and legal rights of our workers and those of our subcontractors and encourage a cooperative workplace with equitable, innovative and productive industrial relations.

We maintain industrial harmony on Buildcorp sites by:

- ▼ Creating a dispute-free environment through consultation and common purpose
- ▼ Communicating openly and keep our employees well-informed on industrial matters
- ▼ Providing safe and healthy working conditions, including training of our employees to properly and safely perform their work
- ▼ Having a zero-tolerance culture for discrimination, bullying or harassment (See EEO policy)
- ▼ Complying with all relevant statutes, regulations or other legislative instruments, including without limitation, the Fair Work Act 2009 (Cth) and the Code for Tendering and Performance of Building Work 2016 (as applicable), as well as enterprise agreements applying to our workforce



ST VINCENT'S
PRIVATE
HOSPITAL

ST VINCENT'S
PRIVATE
HOSPITAL

A stylized magnifying glass graphic is positioned on the right side of the image. The handle of the magnifying glass is composed of two parallel lines that taper towards the bottom left. The lens is a large circle containing three concentric circles. The word "Risk" is written in a white, sans-serif font, centered within the innermost circle of the lens.

Risk



Risk

Buildcorp upholds regulator, stakeholder and public trust with a risk-aware organisational culture and robust frameworks for identifying and managing all types of risk.

Risk management policy

Buildcorp recognises the importance of and opportunities in assessing and mitigating against our full range of business risks. Buildcorp's Governance and Risk Committee has oversight of organisational-wide risk management. We use a Management Authority Framework tool, available to all employees on the company's intranet. This interactive tool ensures that all decisions, whether they are made on or off-site, are authorised by the right people.

Much of our day-to-day risk management regime is concentrated around five key risks in the construction industry: safety, bidding for new work, commercial and contractual management, accuracy of cost and programme and built quality.

Our approach to risk management includes:

- ▼ Using the Buildcorp Risk Management Framework to identify, evaluate, address, monitor, quantify and report material risks to Buildcorp management
- ▼ Embedding the Framework into all our planning processes, operating systems and internal controls
- ▼ Using risk management processes that are simple, effective, and well understood by the entire organisation
- ▼ Constantly improving these processes while ensuring proper compliance, including regular reviews of safety, quality and commercial management policies, controls and processes
- ▼ Providing the training, facilities and motivation necessary for our people to implement and maintain effective risk management practices

Cyber security policy

Buildcorp understands the critical importance of protecting and securing our data and information, and the data and information of our clients, employees and other stakeholders. We have appropriate systems and controls in place to protect confidential, sensitive and personal information and ensure compliance with all legislation regarding data and information security and privacy.

Specifically, we:

- ▼ Employ cyber security measures to protect customer, employee and supplier information and secure our IT systems against cybersecurity attacks and breaches
- ▼ Test critical areas regularly for rapid recovery and sound data backup procedures
- ▼ Test data recovery processes periodically
- ▼ Regularly review data security processes
- ▼ Regularly review IT and business systems strategies to ensure that the organisation stays at the forefront of innovative solutions that promote better client experiences and internal effectiveness
- ▼ Train all staff in the secure use of all devices, including password protection, email scam identification and secure data transfer

Tax risk management policy

Buildcorp maintains a high standard of integrity and professionalism to sustain our reputation and earn the trust of the relevant tax authorities. We manage Buildcorp's tax position to comply with relevant laws and regulations, under an appropriate risk control framework.

To protect our reputation with revenue authorities, we:

- ▼ Undertake a regular analysis to ensure we comply with our Tax Governance Framework
- ▼ Document our processes and procedures around tax and undertake periodic control testing
- ▼ Implement a risk framework that ensures we manage transactions/events of high tax risk appropriately
- ▼ Keep a tax risk register, outlining the 'open' tax risks of Buildcorp, which is regularly reviewed and updated
- ▼ Engage expert external tax advisors as appropriate to identify potential tax risks that may reside within the wider business

A green shield with a checkmark and the word 'Quality'. The shield is a light green color and is centered on a darker green background. A large, light green checkmark is drawn across the shield. The word 'Quality' is written in white, sans-serif font, positioned to the right of the checkmark and partially overlapping the shield.

Quality



2:01 pm
Dashboard: Urbanest Haymarket

Urbanest Haymarket

Targeted PC date: 06 October 2016

ONSITE

- Structure
- Services
- Fitout
- Scan QR code
- Facade/External Works

Mission Statement
Planning to Make Every Day Count

Quality

Underpinning 'The Buildcorp Way' for quality management is a simple mission: 'We do the right thing today, to handover defect-free tomorrow.'

When it comes to producing quality outcomes, we make every day count. Our globally recognised quality system sets out a clear process of stakeholder collaboration, supported by tools, to help our project teams define, manage and deliver to the highest quality. It is our daily commitment to 'do the right thing' by following this system to make it easier to handover defect-free and provide our clients with a positive experience.

We use a Quality Management System certified to ISO9001 and a Quality Management Framework, based on a continual improvement cycle, to prevent quality incidents from arising during and post construction, and enable defect-free handover.

We meet our quality aspirations by:

- ▼ Using our Quality Management Framework to define quality outcomes at every stage, and encourage supply chain and end user collaboration to reduce risk and variation and promote continual learning from past mistakes
- ▼ Using our collaborative, mobile quality management system, Onsite, to proactively identify and mitigate any potential defective workmanship at any stage of the project cycle
- ▼ Using quality planning tools over the life of each project
- ▼ Continuously training project teams, clients, consultants and subcontractors in quality management
- ▼ Using quality data from reviews, feedback and Onsite to improve the performance and effectiveness of our quality system



buildcorp.com.au