

# VENDOR CODE OF CONDUCT

Procurement

7<sup>th</sup> July 2021

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## 1 Document Control

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Version	Revision date	Requested by	Modified by	Approved by	Section revised & change reference
01	13/08/2015	Jamie Andrew	Jamie Andrew	Jamie Andrew	New issue
02	06/02/2017	Jamie Andrew	Jax Fong	Jamie Andrew	Amended to cater globally
03	02/06/2017	Rob Walczak	Stephanie de Souza	Murray Peters	Update document template version.
04	13/06/2017	Rob Walczak	Stephanie de Souza	Murray Peters	Update Headers and Footers
05	25/07/2017	Suminto Lee	Murray Peters	Murray Peters	Update Section 10 – Environment and Sustainability
06	17/08/2017	Stephanie de Souza	Stephanie de Souza	Murray Peters	Release Version
07	26/09/2017	Cory Cvetkovic	Stephanie de Souza	Murray Peters	Amended naming references
08	09/10/2019	Lara Brummel	Ryan Fowler	Brian Peirce	Removal of Brookfield branded website links
09	07/07/2021	Brian Peirce	Ryan Fowler	Brian Peirce	Modern Slavery Inclusion

## 2 Introduction

As a business that delivers services to all of our customers through a network of trusted Vendor partners it is essential that we always behave with unquestioned integrity consistent with our core values. These standards apply equally to all Employees, Directors, Officers and Vendors to BGIS

To help our vendors and their employees, agents and sub vendors (collectively referred to as “Vendors”) understand these expectations we outline our commitment and expectations in the following document.

Doing business with integrity is the only way to do business. Thank you for continuing to uphold our Company’s commitment to ethical behaviour and integrity.

## 3 Objectives

At BGIS we are committed to a policy of fair dealing and integrity in the conduct of all aspects of our business. As a recognised leader in the provision of Facility Management, Real Estate Management, and Project Management Services, our core values must be reflected in our actions and behaviour. Each of us has a personal responsibility to uphold and extend our standards of ethical behaviour.

Consistent with our Company's Ethics Policy and Code of Business Conduct, the Vendor Code of Conduct has been developed to establish a minimum set of requirements to current and potential Vendors. These principles speak to the commitments we make to our clients, our drive to deliver innovative business solutions and relationships built on partnerships, trust, integrity, and personal responsibility. These principles establish the ethics and standards required for engaging in business with BGIS.

BGIS expects its vendors to fully comply with these principles, as they in turn apply these to their own employees, agents, affiliates, vendors, and sub-vendors that they work with in the delivery of goods and services for BGIS and / or BGIS clients.

## 4 Reporting Concerns, Asking Questions

We are all responsible for protecting our culture of Integrity. A potential violation is a serious matter. If you see something or are unsure if something potentially violates the Code of Conduct, speak up! We expect everyone to let us know about any suspected violation of our Vendor Code of Conduct.

### No Retaliation Policy

BGIS does not tolerate retaliation for asking questions or raising good-faith concerns of possible violations of the Vendor Code of Conduct.

How do I report a violation?

Contact the Account Manager for your contract and raise the concern with them or alternatively you can contact procurement

[Procurement.APAC@APAC.BGIS.com](mailto:Procurement.APAC@APAC.BGIS.com)

Or alternatively report the incident to our 24-hour Ethics Hotline, via [www.BGIS.ethicspoint.com](http://www.BGIS.ethicspoint.com) or call **Australia**

Step 1) 1-800-551-155 (Optus) or 1-800-881-011 (Telstra) Step 2) 844-884-0094

### New Zealand

Step 1) 000-911 Step 2) 844-884-0094

### Our Values

BGIS values have strengthened our organisation, shaped our culture and guided behaviour on the job. We expect the Company's values as listed below, to be followed at all times, across BGIS.

- Unwavering Integrity
- Memorable customer experience
- Engaged People

- Passion for Innovation
- Living sustainability

## 5 Standard Practice

A formal agreement and any related counterparts between BGIS and Vendors contains detailed terms and conditions addressing many of the topics within this Vendor Conduct Principles. The various parts of this Vendor Code of Conduct may be in addition to the formal agreement - should there be any conflicts, the terms and conditions of the formal agreement and any related counterparts will govern.

## 6 Communication

Vendors must make the BGIS' Vendor Code of Conduct and other relevant / required information available to employees who work on sites on behalf of BGIS.

Vendors must implement open lines of dialogue/communication between employees and management to champion resolution of issues and improve overall working conditions.

## 7 Ethics and Integrity

BGIS Vendors play a key role in our continuous growth and success. In order to avoid any conflict of interest and to keep business relationships on a professional basis, the following will be adhered to:

- BGIS expects its Vendors to provide a quality product or service for which they will be fairly paid.
- In selecting vendors, BGIS will ensure all competition is conducted in an open, consistent, and transparent manner.
- No items of value are to be provided to BGIS' employees by the vendor. Gifts to be offered by the vendor to BGIS' employees such as tickets to sporting events, concerts, personal travel, or any type of personal item are discouraged by our business practices and must be declared.
- If any BGIS employee engages in any type of unethical behaviour such as requesting anything of value from the vendor, the vendor is requested to report the incident to our 24-hour Ethics Hotline .

BGIS vendors must strictly adhere to and comply with all laws and regulations related to fraud, bribery, corruption, money laundering and prohibited business practices. This includes not giving, receiving, or participating in activities on behalf of or representing BGIS in relation to:

- Bribes including facilitation payments.
- Gifts.
- Donations including political donations to candidates and political parties.



- Activities related to money laundering or any activities that facilitates money laundering, the financing of terrorism or other criminal activities.

Unless disclosure is authorised or legally mandated, our vendors are expected to properly disclose and protect business information, customer information, and intellectual property rights in accordance with applicable requirements and prevailing industry practices and protect vendor and employee confidentiality.

## 8 Modern Slavery

BGIS is committed to ensuring compliance with the Australian Modern Slavery Act 2018 (Cth) and expects the same of its suppliers, contractors, and vendors.

In being a supplier to BGIS, it is expected that all vendors regularly investigate their labour practices to satisfy itself that there is no modern slavery or human trafficking used anywhere in its business and those of its supply chain

At any time, BGIS may request supporting documentation and information from our vendors, demonstrating they have monitored, assessed, and addressed risks identified relating to modern slavery and have performed appropriate due diligence to prevent modern slavery.

Vendors must notify BGIS immediately following any confirmed instances of modern slavery in their business or supply chains, and the actions undertaken by the vendor to remedy the issue/s

## 9 Labour

Vendors are expected to uphold the human rights of workers, and treat them with dignity and respect and:

- Prohibit the use of forced, bonded, indentured or involuntary prison labour.
- Allow workers to leave employment upon reasonable notice and not require workers to hand over government-issued identification, passports or work permits as a condition of employment.
- Prohibit child labour. The use of workplace apprenticeship programs, which comply with all applicable laws and regulations, is encouraged.
- Set work hours to comply with local law and legislated employment standards. Where there are no local laws, our vendors are expected to refrain from requiring, except in emergency or unusual situations, work in excess of six consecutive days without a rest day away from work.
- Comply with applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Employees receive at least the minimum wage required by law or the prevailing industry wages; whichever is higher. Workers receive full details regarding deductions for taxes, benefits, etc. Wages are not deducted for disciplinary purposes and are paid in cash, cheque or by direct deposit.
- Maintain workplaces free of unlawful discrimination and harassment in all of its forms, including that related to race, colour, ancestry, creed (religion), place of origin, ethnic origin, citizenship,

sex (including pregnancy, gender identity), sexual orientation, age, marital status, family status, disability, receipt of public assistance, union membership, and conviction for which a pardon has been granted. This applies to recruitment, salary, benefits, advancement, discipline, termination, and retirement.

- Respect voluntary freedom of association, including the right to organize and bargain collectively in a manner that is legally compliant. Workers' representatives are not subject to discrimination and have access to workplaces necessary to carry out their respective functions. Where worker representation and collective bargaining are restricted by law, efforts should be made to facilitate open communication and direct engagement between workers and management as alternative ways of ensuring the workers' rights, needs and views are considered and acted upon appropriately and in good faith.

## 10 Health and Safety

Our vendors are expected to provide healthy and safe workplaces and comply with relevant health and safety legislation, regulations, and codes of practice.

Ensuring safe working environments and undertaking activities using safe working practices is a fundamental requirement for BGIS' vendors. We expect our vendors to practice the following:

- To follow the applicable regulations for the jurisdiction where the work is occurring, BGIS polices as outlined in vendor safety inductions as well as any additional documented policies and work procedures as may be prescribed by BGIS' clients with regards to working within their properties.
- Control worker exposure to potential safety hazards (i.e. electrical and other energy sources, chemical, fire, heat, vehicles, asbestos, and fall hazards) through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures. Where hazards cannot be adequately controlled by these means, provide workers at no cost as appropriate the proper training, personal protective equipment and ensure proper maintenance of equipment.
- Workers are not to be disciplined for raising safety concerns.
- Exchange of information about risk prior to work commencement and understanding how risks will be managed.
- Operate a system of specific authorisation (i.e. asbestos, permit to work, restricted access and working at height) for high-hazard tasks.
- Maintain appropriate emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training, drills, appropriate fire detection, fire detection and suppression equipment, adequate exit facilities, and recovery plans.
- Implement documented procedures to ensure the management of workplace, incident injuries and illnesses, including provisions to: a) encourage employee reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate and implement corrective actions to eliminate their causes; and e) facilitate safe and early return of employees to work. All injuries related to work that is occurring on behalf of BGIS, will be reported to BGIS.
- Vendor's employees will report fit for work and should be free of the negative effects of alcohol, drugs, medications or any other substance that could cause impairment.

## 11 Environment and Sustainability

We expect vendors to minimise the adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public as well as ensuring the following:

- Institute a complete and effective environmental management system (i.e. written policies, processes, and requirements for environmental protection and pollution prevention source or reduction) that is in accordance with the relevant laws, regulations, and standards.
- Vendor management shall be aware of and assign the responsibility and authority for ensuring that the environmental management system aligns with BGIS' ISO 14001:2015 Environmental Management systems and BGIS' Environment and Sustainability Policy.
- Conduct regular environmental audits to confirm that its operations are environmentally responsible and are conducted in accordance with applicable laws, regulations, and standards.
- Adhere to applicable laws regarding prohibition or restriction of specific substances, materials and waste ensuring compliance obligations achieved.
- Adhere to, collaborate with, and participate in BGIS or BGIS' clients' environmental programs, training, performance reporting and other related initiatives.
- Taking voluntary initiatives to reduce environmental impacts and the results shall be monitored, measured, analysed, and evaluated. These include efforts to improve energy efficiency, water efficiency, control greenhouse gas emissions, recycle materials, phase out use of toxic substances, conduct life-cycle assessments of products where permissible, and promote "greening of the supply chain".
- Shall determine the environmental aspects of the activities, products and services that can be controlled and those that can be influenced, and their associated environmental impacts, considering a life cycle perspective.
- Be willing to participate in BGIS Vendor Integrated Management System Internal Audit on annual basis when scheduled.

## 12 Protecting Information

Our vendors must comply with published Privacy laws and regulations and must use information obtained for its intended lawful use. The information obtained must be stored as agreed with BGIS and/or BGIS client. Vendor must have safeguards in place ensuring the information is protected from unauthorised access and disclosure, including access to such information by those employees with legitimate business purpose.

## 13 Insider Trading Information

Our vendors must have effective policies and procedures that meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of insider trading information.



## 14 Record Keeping

Vendors must retain and maintain accurate internal records to ensure proper compliance with its obligations to BGIS or BGIS' clients. This responsibility prohibits false or misleading records, as well as any other misrepresentations or omissions. All business transactions are to be properly authorised.

Vendors shall not destroy any records that may be required for any pending legal or regulatory proceeding of which the vendor becomes aware of.

## 15 Disciplinary Action for Code Violations

BGIS reserves the right to take disciplinary action for Code violations that fits the nature and particular facts of the violation. This could, in most severe circumstances, include immediate termination for cause and, if warranted, legal proceedings may be brought against the vendor.

## 16 Statement of Compliance

All vendors will be provided with a copy of the BGIS Vendor Code of Conduct and an authorised representative on behalf of the vendor is required to acknowledge and agree to. The authorised representative shall ensure that any of the vendor's employees or contractors interacting with or on behalf of BGIS will be provided a copy of the Vendor Code of Conduct.

On an annual basis, the authorised representative will be required to re-certify compliance with the Code. Annual execution of a Statement of Compliance with the Code shall be a condition of your continued engagement with BGIS.

## 17 BGIS Links

### Where Can I Find More Information?

- For more information talk with your supervisor, manager, Procurement or Legal Department, or contact the Ethics Hotline.