

Supplier Code of Practice

Publish date:	15 July 2019	Version:	1.0
---------------	--------------	----------	-----

Purpose

Cross Yarra Partnership (**CYP**) is committed to safe, ethical 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 to us.

This Supplier Code of Practice (**Code**) describes the minimum expectations in the areas of: health, safety and environment; integrity, ethics and conduct; corporate governance; and labour and human rights.

Confirmation and acceptance

By providing a quote to CYP, you (the Supplier) have confirmed that you accept and commit to the terms of this Code.

Scope

By Supplier, CYP means any entity that supplies goods or services to CYP. Where this Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier and its related entities. Where this 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 this 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.

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

1 Health, safety and environment

Worker health, safety and well-being is important to CYP.

Suppliers must provide a healthy and safe work environment and integrate sound health and safety management practices into their business.

1.1 Workplace health and safety management

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

Suppliers must:

- (a) advise CYP of environment, health and safety hazards associated with the design, documents, types of materials and methods of construction proposed or specified by the Supplier;
- (b) manage occupational health and safety hazards;
- (c) provide workers with job-related training and consult with employees in relation to the provision of information and training; and
- (d) ensure all workers are inducted and have all required personal protective equipment prior to accessing any CYP site.

1.2 Access to CYP sites

Suppliers must not access any CYP site, including the construction hoardings and external structures, unless the Supplier has:

- (a) appropriate site induction certification¹ (and will provide evidence of that certification on request from CYP or its D&C Subcontractor);
- (b) contacted CYP's D&C Subcontractor to confirm it understands and will comply with all applicable safety requirements (including, if required, completion of a Safe Work Management Plan, traffic management requirements and others);
- (c) notified CYP and the relevant site manager of the details of its visit (including time, location and any services it will perform or equipment it will bring to the site);
- (d) appropriate public liability and property damage insurances (and will provide evidence of that insurance on request from CYP); and
- (e) if the Supplier is installing any goods at the site, completed an Install Certificate, that has been approved by CYP and its D&C Subcontractor.

1.3 Environmental impacts

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

¹ Please see here for further details <http://cypsubcontractors.com.au/the-registration-process/>

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to implement an environment, health and safety management system and manage the environmental impact of their operations.

2 Integrity, Ethics and Conduct

CYP requires 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.

2.1 Business integrity

Suppliers must comply with all anti-bribery, anticorruption and anti-money laundering laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities.

2.2 Record keeping and documentation

Suppliers must 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.

2.3 Professional conduct

Suppliers must conduct themselves in a manner that is fair, professional and that will not bring CYP into disrepute.

2.4 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 CYP.

Suppliers must not share any content (such as social media posts or photos) related to work commissioned by CYP, without prior CYP approval.

2.5 Conflicts of interest

CYP believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

Suppliers must:

- (a) declare to CYP, any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with CYP; and
- (b) avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with CYP. Any conflicts of interest that cannot be avoided are to be declared and managed appropriately.

2.6 Gifts benefits and hospitality

Suppliers must not offer or receive gifts or entertainment or sponsored travel that could affect, or be perceived to affect, the outcome of business transactions or are not otherwise reasonable and justified.

2.7 Professional standard

Suppliers must perform their services with the degree of professional skill, care and diligence expected of a competent professional supplier experienced in carrying out the same services, providing the same goods, or goods or services of a similar size, scope and nature.

Suppliers' workers must hold appropriate qualifications and have received appropriate training for the performance of any services they perform for CYP and must provide evidence of such qualifications and training to CYP upon request.

2.8 Standards for documents

The Consultant must ensure that any designs, drawings, specifications and other documents produced by the Supplier for CYP:

- (a) are suitable for their intended purposes;
- (b) comply with all relevant legislative requirements and standards, unless otherwise expressly instructed by CYP in writing;
- (c) comply with CYP's reasonable format standards and any other reasonable standards notified by CYP;
- (d) do not infringe any intellectual property rights or moral rights; and
- (e) otherwise comply with all requirements of this Code.

3 Corporate governance

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

3.1 Risk assessment and management

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.

3.2 Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

- (a) perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
- (b) cooperate openly and honestly with any CYP audit, assessment or review.

4 Labour and human rights

CYP believes 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.

4.1 Anti-discrimination

Subject to applicable laws, Suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

4.2 Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation and abuse.

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.

4.3 Human rights

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

4.4 Prevention of involuntary and underage labour

Suppliers are expected to:

- (a) ensure that all work is undertaken without coercion and not tolerate or support the use of forced trafficked or compulsory labour, and extend this approach through all areas of their supply chain;
- (b) not use any form of forced, bonded or indentured labour; and
- (c) employ only workers who are the applicable minimum legal age and not engage in practices relating to or subcontracting to organisations who employ child labour at any stage of the manufacturing or service delivery process.

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.

4.5 Working hours, wages and benefits

Suppliers must:

- (a) comply with all applicable laws and regulations with respect to wages, working hours and workers compensation insurance (and provide evidence of that insurance on request from CYP);
- (b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- (c) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

4.6 Freedom of association and collective bargaining

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

5 Raising a concern (whistleblowing)

CYP expects its suppliers to help our business succeed and to promote our values and high professional standards. To help meet this expectation, CYP is committed to fostering an environment where our suppliers and sub-contractors can raise concerns about any actual or suspected breach of this Code.

Suppliers, their employees and sub-contractors can raise concerns via:

- (a) their CYP point of contact, or
- (b) email to CEO@crossyarrapartnership.com.au.