



## Responsible Sourcing Policy

HH Civil Pty Ltd (HH Civil) is one of Australia's leading Civil Engineering and Construction company with substantial experience in the industry and are committed to performing proper and ethical business activities. We require that our business and our suppliers, and the workers thereof, operate to a standard which is globally acceptable and compliant with applicable legislation.

### Purpose

The purpose of this policy is to set out HH Civil's commitment respecting human rights for our own team members and the workers in our upstream supply chain in alignment with the principles and guidance contained in the United Nations Guiding Principles on Business and Human Rights. This means we undertake due diligence activities to identify, prevent and mitigate any adverse human rights impacts of our operations. Governance oversight of our approach to human rights management is provided by the Company Directors.

This policy is consistent with the principles of the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights. Furthermore, HH Civil supports the ethos of the United Nations Global Compact (UNGC) and this policy embraces and reflects the UNGC's core values of human rights, labour standards, the environment and business integrity. This policy also complements our worker engagement strategy that ensures our team members are treated with fairness and respect.

In line with our purpose and values, HH Civil is committed to the regular review of our responsible sourcing approach.

### Commitment to Responsible Sourcing

HH Civil is an Australian business with a valued, long standing and varied existing supply chain. We recognise that sometimes there are a number of different legal frameworks and cultural environments that our suppliers may operate in. We also recognise that we need to continuously monitor our responsible sourcing framework. We will review this policy annually, or when circumstances dictate; for example, to align with changes in regulations or address emerging issues.

We require all suppliers with whom we have a direct relationship for goods and/or services we sell or use in our businesses to comply with this policy. We regularly review our supplier arrangements, and we encourage our suppliers to be open and honest about the challenges they face so we can help them find practical solutions.

We require our direct suppliers to communicate this policy to their own suppliers and extend the principles of this policy through their supply chain. We are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

To support this policy, HH Civil has developed a set of Responsible Sourcing Principles, which apply to all of our suppliers with whom we have a direct relationship for goods and/or services we sell or use in our business.

The Responsible Sourcing Principles are a key way that we implement the commitments in this policy. They include comprehensive criteria on business integrity, labour rights, fair and safe working conditions and environmental compliance.



We require suppliers of goods to have established arrangements which are consistent with our commitment to responsible sourcing and upholding human rights.

### Responsible Sourcing Principles

Our Responsible Sourcing Principles are designed to address specific responsible sourcing risks in our upstream supply chain in the following key areas:

- **Compliance with Local Laws:** Suppliers must comply with all relevant local laws, rules and regulations in the countries in which they operate, including those relating to business integrity, transparency, bribery and corruption.
- **Management Systems:** We believe that robust management systems, including hiring, disciplinary and termination practices, are important for suppliers to build and develop in order to support compliance requirements and sustainability goals. Suppliers are responsible for establishing these management systems to support their operations.
- **Social and Labour Standards:** All workers must be treated with respect and dignity. Suppliers are to provide workers with a safe place to work, and respect workers' rights to freedom of association. Workers' grievances are to be heard, appropriately investigated, and any required remedial action taken, in addition to building capacity and awareness around social and labour practices.
- **Environmental Standards:** Suppliers must comply with all applicable environmental laws and regulations and, maintain an environmental management system that identifies and manages environmental impacts.
- **Additional Standards:** Where applicable, suppliers must comply with standards relating to overseas foreign migrant workers, authorised subcontracting and homeworkers.

### Remedy and Grievance Mechanisms

It is important to HH Civil that effective remedies are available for affected people and communities where it is identified that our operations have caused or contributed to adverse impacts. These remedies may be provided through direct engagement with affected people and communities, or collaboration with our suppliers or other third parties.

HH Civil is committed to ensuring channels are provided through which adversely affected people or communities can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination, or victimisation. HH Civil provides a Speak Up service for our team members and direct suppliers (and their team members) as a mechanism by which responsible sourcing concerns can be raised anonymously, and we are committed to working with our suppliers to ensure appropriate mechanisms are made available within their own supply chains.

Please refer to our Whistleblower Policy for more information on the Speak Up service.

#### Approved by:

A handwritten signature in black ink, appearing to read 'DH' with a long horizontal stroke extending to the right.

**Darren Hurson**

Director  
HH Civil Pty Ltd

Date: 13/10/21