

Human Rights Policy

Our Commitment

Mulpha Australia Limited and its subsidiaries (the Group) is committed to aligning our strategy and growing our business in an ethical way that promotes human rights and provides a positive impact to the environment and local communities.

Mulpha recognises that our supply chain is complex and that there is potential to directly cause, contribute to or be directly linked (through another entity such as a principal contractor in the construction industry) to modern slavery.

Mulpha operates predominantly in Australia and the majority of our suppliers are contracted directly in Australia. The group has operations in Queensland, New South Wales and Victoria and manage a large number of suppliers directly through our operating businesses. Whilst, the majority of our suppliers are Australian based we recognise that in turn our suppliers may procure materials and services from outside of Australia.

Our Standards

To achieve our commitment in relation to human rights we actively engage and consult with relevant business units and entities which form part of the Group and more formally report modern slavery risk, group-wide risk assessment processes, continuous improvement opportunities, actions plans and the content of our modern slavery report quarterly to the executive led Risk Management Committee which includes representatives from each Mulpha business division.

We have committed to the following standards:

Compliance with relevant laws and regulations

Comply with laws and regulations in the countries in which we source, operate and supply including relevant international laws and trade sanctions and including those related to work health and safety and Modern Slavery.

Develop a Supplier Code of Conduct

As part of our ongoing commitment to operate responsibly and to ensure we engage suppliers who are aligned with our commitments we set expectations of our suppliers which are documented within this Supplier Code of Conduct. Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

We expect our suppliers to comply with the requirements of the Supplier Code of Conduct. In the event of a significant breach of the Supplier Code of Conduct or ongoing non-compliance we reserve the right to terminate the relationship.

Build long-term partnerships with suppliers

We aim to build long-term partnerships with suppliers. We regularly review our suppliers and complete supplier due diligence (where appropriate).

Manage risk within contract terms and terms of trade

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We are committed to continually reviewing our contracts and have developed model modern slavery clauses to ensure our standard terms and conditions include that suppliers have an obligation to identify the risk of, and prevent the occurrence of, modern slavery within its organisation and supply chain, and to report to Mulpha in relation to their modern slavery risk management.

Labour Practices

Prevention of involuntary and underage labour

We will comply with all applicable laws and regulations including laws and regulations concerning hours, compensations and working conditions to:

- (a) ensure that all work is undertaken without coercion;
- (b) not use any form of forced, bonded or indentured labour; and
- (c) employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. And we will:

- (d) 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
- (e) be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

Working hours, wages and benefits

We will:

- (f) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- (g) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- (h) 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.

Freedom of association and collective bargaining

We 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.

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Raise any concerns

We are committed to high standards of conduct and ethical behaviour across the business to ensure that individuals who disclose wrongdoing can do so safely, securely and with confidence that they will be protected and supported. Our Whistleblowing Policy articulates the avenues which employees and other stakeholders can raise concerns of actual or suspected misconduct.

Related Policies

- Code of Conduct
- Whistleblowing Policy
- Privacy Policy
- Risk Management Policy
- Workplace Health and Safety Policy
- Environmental Policy
- Supplier Code of Conduct
- Anti-Bribery and Corruption Policy
- Cyber Security Policy
- IT Disaster Recovery Plan

Document Control Log

Version	Document Owner	Author	Approval	Date
1.0	Naomi McRae – General Manager – Legal, Governance and Compliance	Lesley Stradling – Compliance Manager	Risk Management Committee	9 November 2022