

Supplier Code of Conduct

Landcom

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1 Purpose & Application

As the NSW Government's land and property developer, Landcom must do the right thing at all times – it is the way we conduct business. For this reason, we set the bar high in the way we approach our work to ensure that we meet the highest possible standards of integrity, professionalism and ethical conduct.

As a Landcom Supplier, you are a valued member of the Landcom team and your actions and conduct, and those of your staff when working on Landcom projects or matters, are a reflection on Landcom.

This Supplier Code of Conduct aims to encourage, educate, support and, where appropriate, mandate requirements that will assist Landcom and its Suppliers to contribute to sustainable business operations. It outlines Landcom's expectations that are to be maintained from its suppliers, which includes the highest standards of conduct and ethics when delivering all goods and services.

This Code applies to all Landcom's Suppliers and any sub-Suppliers engaged for the purpose of providing goods and services to Landcom. It is important that you understand and follow this Code to preserve Landcom's reputation for ethical and principled behaviour.

2 Defined Terms

Term	Definition
CEO	means Landcom's Chief Executive Officer
Code, the Code	means this Supplier Code of Conduct
Conflict of Interest	means circumstances in which your personal interests may conflict or appear to conflict with your ability to deliver on your obligations to Landcom. It also exists when a reasonable person might perceive that your personal interests could be seen to be favoured over your ability to prioritise Landcom's interests. Your competing loyalties influence you (consciously or otherwise) to pursue a personal benefit for you, your friends, your family or any other parties at the expense of Landcom. In practice, this requires a connection or overlap between those interests and duties
Our or ours	means Landcom and what belongs to, or is unique to our corporation
People	means Staff, Suppliers, customers and the community who are affected by Landcom operations
Policy/Policies	refers to a Landcom policy document and any supporting documents including but not limited to plans, procedures or frameworks, all sitting within Landcom's policy framework
PID Act	means the <i>Public Interest Disclosures Act 2022</i> (NSW)
Staff	includes the Landcom Board, the CEO, all permanent and temporary employees and contingent workers engaged by Landcom. This term is used for the purposes of this Code
Supplier	means all staff, contractors, subcontractors, consultants or sub-suppliers engaged or completing work for or on behalf of Landcom
We	means Landcom collectively as a corporation

Term	Definition
You, you or your	means a Supplier to whom this Code applies

3 Guiding principles

This Code provides the following five guiding principles that are to be complied with when working for or on behalf of Landcom.

1. Act with honesty and with integrity;
2. Protection of People, Health & Safety and the Environment;
3. Appropriate communication, ensuring exchange of information is conducted in a manner that is considered suitable for the context and audience;
4. Supply chain management, covering the interactions between the Supplier and Landcom; and
5. Reporting a breach under this Code.

3.1 Act with honesty and with integrity

The Supplier must act with honesty and integrity at all times when providing goods and services to Landcom. This includes complying with the following:

3.1.1 Corporate Governance

- Comply with all laws and regulations relating to bribery, corruption, anti-money laundering, counter terrorism, responsible financing, and prohibited business practices.
- Have an effective and transparent allocation of responsibilities within the management of your business, and manage your risk, governance, legal and compliance appropriately.
- Treat your staff fairly and lawfully.
- Meet your contractual obligations to Landcom and your own suppliers.
- Encourage the implantation of the principles outlined in this Code in your own business practices, organisation and workplace.
- Share these principles with all your staff or suppliers who are involved in providing goods services to Landcom, including providing training and guidance as required.
- Influence your own supply chain and related third parties to adopt these principles.
- Verify compliance by providing supporting information as evidence and facilitate site visits or audits as required by Landcom.

3.1.2 Conflicts of interest

Promptly advise Landcom of any relationship that could be seen as a Conflict of Interest. Possible activities that may give rise to a conflict of interest include any dealings in land or other business activities that relate to Landcom's projects, or if you provide services to a third-party who is also providing services to Landcom, such as providing services to a counterparty in a Landcom transaction.

3.1.3 Gifts and benefits

The Supplier must not offer nor accept gifts, benefits, secret commission, bribes, or hospitality as it may be perceived as having an undue influence on the work Landcom undertakes and has the potential to compromise current and future impartial decision making. The Supplier must not offer

nor accept anything that is given in order to persuade Landcom or the Supplier to act improperly in undertaking work for or on behalf of Landcom. Attempts to bribe Staff or Suppliers is corrupt conduct and must be reported to Landcom. You may make an anonymous report via [Landcom's externally managed "Speak Up" Integrity Hotline](#). It may also be referred to the NSW Independent Commission Against Corruption or the NSW Police, as it may constitute a criminal offence.

3.2 Protection of People, Health & Safety, and the Environment

The health, safety and dignity of all people involved with Landcom or Landcom projects, and the protection of the environment, are of fundamental importance to Landcom. The Supplier must comply with the following when providing goods and services to or for and on behalf of Landcom:

3.2.1 Protection of people – respect, inclusion and dignity

The Supplier's interactions, communication and actions must not prejudice the operation, security, trust, integrity, or reputation of Landcom. You must be respectful, maintain inclusion and a safe workplace where people feel safe to speak up about concerns. The Supplier must not engage in any form of discrimination, harassment, and bullying, including any obscene or suggestive language, sexual banter, or the mistreatment of any person. All interactions with vulnerable members of the community must be conducted with respect and dignity, offering support in line with their needs wherever possible.

The Supplier shall strive to contribute to the local communities and must have procedures in place to minimise negative impacts to the communities. The Supplier shall support Landcom initiatives that engage with key community groups that Landcom impacts through its operations. You are required to report to Landcom any incident or allegation of inappropriate conduct you observe at a Landcom workplace or in relation to the work you are undertaking for Landcom.

3.2.2 Protection of People's Health & Safety

We all have a responsibility to ensure our workplaces including offices, sales offices or any site Landcom is responsible for, are safe and secure and protect our health and wellbeing. Everyone must proactively identify, assess, resolve and report risks and hazards. All works, operations and events must be conducted in a manner which safeguards the health, safety and welfare of Staff, Suppliers, customers and the community who are affected by Landcom operations.

While conducting work for Landcom the Supplier must:

- Comply with all relevant laws and regulations in relation to employment practices, benefits, work health & safety, environment and anti-discrimination;
- Follow any legislative and Landcom requirements to maintain the health, safety and wellbeing of staff and visitors to sites or events that Landcom is responsible for;
- Implement and maintain written health & safety and labour workplace management policies and standards relevant to the activities or scope of works;
- Not use child, forced or involuntary labour in any form;
- Be committed to the provision of training and development for all staff ;
- Provide fair pay and working conditions, including adequate rest periods and parental leave, and match prevailing working conditions;
- Not work if you or your own staff are impaired under the influence of alcohol or illicit drugs;

- Not consume alcohol or illicit drugs when in control of or operating a vehicle, machinery, plant or equipment when conducting work for and on behalf of Landcom;
- Not drive or operate machinery if you are under any prescribed or over the counter medication that may impair your ability;
- Not conduct any inappropriate, aggressive and violent behaviour;
- Ensure that all high-risk activities are completed by competent and licensed personnel;
- Complete written risk assessments and safe work method statements before any activities that may have risks to health, safety and the environment in consultation with the staff involved in the scope of works; and
- Report any issues, concerns or incidents related to health, safety and environment to Landcom immediately.

When the works conducted by the Supplier could cause harm to People due to unplanned incidents and emergencies, the Supplier must ensure that emergency response arrangements are established, written, tested, communicated and implemented.

3.2.3 Protection of the environment

The Supplier must comply with all relevant laws and regulations about the environment, which includes but is not limited to land and water management, waste and recycling, handling and disposal of toxic substances, discharges and emissions, noise, transportation of products, wastes and materials selection, environmental issues management, and community consultation.

When the works conducted by the Supplier could cause harm to the environment, the Supplier must have a written policy addressing environmental management and have a written environmental management plan to identify and minimise the risk of significant impacts associated with energy, water, and waste impacts.

3.3 Appropriate communication

The Supplier must always act and communicate with respect and professionalism when providing goods and services to or for an on behalf of Landcom.

3.3.1 Confidentiality of information

The Supplier must maintain the confidentiality of any official information and documents you have access to which are not published or available to the public. The Supplier has the following responsibilities:

- Not reveal confidential or sensitive material;
- Properly secure, label, and (when appropriate) dispose of sensitive information and confidential material;
- Only accept confidential, sensitive, or personal information if all parties have previously signed an appropriate agreement to enable the sharing of information; and
- Safeguard the personal, sensitive, and confidential information received from others, particularly under non-disclosure agreements.

3.3.2 Protecting personal information

The Supplier must protect the personal and health information it may receive from Landcom or for and on behalf of Landcom by complying with the appropriate laws, currently **the *Privacy and***

Personal Information Protection Act 1998 (NSW) and Health Records and Information Privacy Act 2002 (NSW).

3.3.3 Misuse of information

You must not misuse the access gained through your engagement with Landcom, or other government-held information, to secure future employment advantages within or outside Landcom, or to benefit any other person or organisation, including those who have worked for Landcom in the past.

3.3.4 Media or press communication

You must not communicate with the media/press concerning Landcom's business activities unless expressly authorised in writing by Landcom.

3.3.5 Social media

Suppliers must not post official Landcom content unless we specifically contract you to do so. The Supplier must not communicate on behalf of Landcom in an official capacity, comment or post any material that might cause damage to Landcom or the NSW Government's reputation. You may only repost Landcom posts, material or comment without substantial or meaningful change as part of showing affiliation or support for Landcom.

3.4 Supply Chain Management

As a State-Owned Corporation, Landcom is required to operate efficiently and maximise the State's investment in it. The Supplier must comply with the following when providing goods and services to or for and on behalf of Landcom:

3.4.1 Use of resources

Treat Landcom property and assets with care and ensure they are secured against theft, loss, damage, or misuse. You must ensure your work is lawful, appropriate and ethical and does not create a risk or liability for Landcom.

Use of Landcom facilities and equipment, including software, computers, and phones is prohibited. The only exception is where you have been formally contracted to supply services to Landcom and the use of Landcom's facilities must be specified in the contract.

3.4.2 Procurement

If your engagement with Landcom involves the procurement of goods or services which will be directly charged to Landcom in addition to the agreed fees payable to you, we expect you to act with honesty and integrity, as Landcom is required to achieve value for money and ensure that public money is spent appropriately.

3.4.3 Modern Slavery Act 2018

Suppliers must comply with the *Modern Slavery Act 2018* (Cth). Suppliers must avoid engaging in, causing or contributing to modern slavery and report any concerns or risks relating to modern slavery they observe, or suspect may be in your supply chain to Landcom. Suppliers can make an anonymous report to Landcom via [Landcom's externally managed "Speak Up" Integrity Hotline](#), or may also report to Landcom any issues via Landcom's Safe Me OH&S reporting mechanism. Suppliers may also be required to complete a Modern Slavery Assessment and online training as part of your contractual obligations.

3.5 Reporting a breach under this Code of Conduct

3.5.1 Reporting breaches of the Code or suspected wrongdoing

Suppliers must report to Landcom, any behaviour you observe (by any party) or suspect to be a breach to this Code, or any unethical, fraudulent or corrupt conduct. You may report the incident immediately by contacting:

- Landcom's Fraud Control and Corruption Prevention Coordinator via email fraudcontrol@landcom.nsw.gov.au;
- NSW Ombudsman Landcom's [externally managed "Speak Up" Integrity Hotline](#); or
- Landcom's CEO or the Board of Landcom.

Everyone who is engaged to undertake works for Landcom is obligated to raise concerns promptly. Landcom is committed to protecting any person who raises concerns about a breach of the Code from retaliation or reprisals. Any attempt to take detrimental action against a person who reports a legitimate breach of the Code will be treated seriously and may lead to the termination of your engagement with Landcom. It may also involve referral to the NSW Ombudsman, the NSW Independent Commission Against Corruption or the NSW Police.

The *Public Interest Disclosure Act 2022* (NSW) provides protection against reprisal if you make a confidential report of serious wrongdoing. For more information, refer to Landcom's Public Interest Disclosures Policy, which is available on Landcom's website here [Public Interest Disclosure Policy \(landcom.com.au\)](#)

3.5.2 3.5.2 What happens if you breach the Code?

If a Supplier is unable or becomes aware that it may not be able to comply with any of the expectations in this Code, the Supplier must contact Landcom immediately and work with us to address the issue, as required. Landcom will address alleged breaches of the Code promptly, in a fair and reasonable manner.

Once an alleged breach is reported concerning your business, your engagement with Landcom may be suspended until the allegation has been dealt with. Failure to meet this Code by you, your staff, or your sub-suppliers can result in termination of your engagement with Landcom.

Document Control Table

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Document delegate name/s	Director, Commercial
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Linked artefacts	
Linked legislation	<ul style="list-style-type: none"> • Health Records and Information Privacy Act 2002 • Independent Commission Against Corruption Act 1988 • Modern Slavery Act 2018 (Cth) • Public Interest Disclosures Act 2022 • Privacy and Personal Information Protection Act 1998 • Ombudsman's Act 1974 • State Owned Corporations Act 1989
Linked risks	<ul style="list-style-type: none"> • Commercial • Regulatory • Reputational • Technology • People & Culture • Stakeholder & Community

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Version	Approval date	Author	Description
1.0	27/11/2019	Landcom	Developed Supplier Code of Conduct
2.0	8/12/2021	Director, People & Culture	Updated to new corporate document guidelines and insertion of Modern Slavery Act provisions.
3.0	24/09/2024	Commercial & Legal	Update to remove reference to Landcom internal staff obligations and focus on Supplier's relationship with Landcom