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# Dobbie Business Code of Conduct

***"Intelligence determines the right path, integrity takes it."***

Dobbie is at the forefront sustainable manufacturing and end-to-end solutions for the civil infrastructure, fire protection, defence, mining, rail and other heavy industries. We actively strive to work in a socially, environmentally, and economically responsible manner. We seek to work with those who share our values regarding Australian manufacturing sovereignty, customer service, innovation, and sustainability, performing together and respecting each other.

This Code of Conduct defines the basic tenets of Dobbie's business practices, and the actions of Dobbie personnel and Dobbie's suppliers, in regard to their responsibilities towards stakeholders and the environment. By promulgating this Business Code of Conduct, Dobbie seeks to establish and continue a culture of integrity, upholding our basic responsibilities to people and planet, but also setting the stage for our long-term success.

Dobbie's operations are guided by this Business Code of Conduct which reflects Dobbie's respect and support of the protections advanced by the *United Nations' Universal Declaration of Human Rights* and *Guiding Principles on Business and Human Rights*, the *International Labour Organization's Declaration* on *Fundamental Principles and Rights at Work*, the *Rio Declaration on Environment and Development*, and the *United Nations Convention Against Corruption*.

Dobbie is committed to internationally recognized good governance and the highest level of integrity and ethical business conduct. Dobbie respects and is committed to the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption.

**The Ten Principles of the UN Global Compact**

- ***Human Rights***

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

- ***Labour***

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

- ***Environment***

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

- ***Anti-Corruption***

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

**Responsible business practices**

Dobbie and its suppliers shall be aware of and comply with the applicable laws and regulations in Australia and any other countries in which they operate. This includes adhering to regulatory best practices. Dobbie expect their suppliers to have a positive impact on the societies they operate in.

Dobbie manufactures from materials and components sourced wherever feasible, from Australian origins. We acknowledge however, that international supply will inevitably occur and that, wherever their source, our supply chain activities have a broad impact and that our responsibilities extend beyond our own operations and into those of our suppliers.

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## Health and Safety

Dobbie provides, and expects all its suppliers to provide, a safe and healthy working environment and take all reasonable steps to prevent injuries, safety incidents, and health hazards to all staff and visitors to its site of operations.

A health and safety program that is appropriate to the nature of the business and its risks is strongly encouraged.

Dobbie and its suppliers shall know and comply with all relevant health and safety regulations and instructions and provide relevant health and safety information and instructions, training, personal protective equipment, and tools to its employees.

Supplier's employees shall not be under the influence of alcohol or illegal drugs while working on Dobbie's site or projects.

## Wages and working hours

Dobbie and its suppliers shall provide fair wages and benefits that meet or exceed the applicable wage and compensation laws in their jurisdictions of operation.

Dobbie and its suppliers shall comply with all the applicable laws and regulations on working hours and maintain accurate records thereof.

## Environmental responsibility

Dobbie and its suppliers shall operate in compliance with all Australian Environmental Protection laws.

Dobbie and its suppliers should be proactive in managing environmental risks and seeking sustainable solutions.

## Anti-corruption

Dobbie has zero tolerance towards bribery and corruption and expects the same from its suppliers.

Dobbie has, and expects suppliers to, establish systems and processes to prevent corruption by setting up an anti-corruption policy and providing the relevant training to their employees and to not engage in business with third parties that do not share these principles.

Additionally, Dobbie and all its suppliers shall not directly or indirectly facilitate money laundering or the financing of terrorism.

**Transparency**

Dobbie should actively promote commercial transparency through the third-party provision of verified, baseline, due diligence data for open assessment.

**Conflict of interest**

Dobbie and its suppliers shall avoid potential conflicts of interest. Suppliers shall disclose to Dobbie any conflict of interest or situations giving the appearance of a conflict of interest. Including if a Dobbie employee or his/her immediately family member:

- holds a material financial or other interest in the supplier
- holds a managerial position with the supplier or
- works for the supplier and such employment creates a conflict of interest or appearance thereof.

**Company assets and data privacy**

Dobbie and its suppliers shall respect the intellectual property rights of others and safeguard Dobbie's own intellectual property and data, including personal data, in accordance with all applicable laws, and shall ensure that the level of its information security is adequate to keep all such information confidential and secure.

Suppliers shall process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

Dobbie and its suppliers shall not sell any products that violate the intellectual property rights of a third party.

**Fair competition**

The Supplier shall compete fairly and comply with the applicable competition laws and regulations in the countries where they operate.

Suppliers shall not collude or enter into any agreement with competitors to fix prices or limit the availability of products or participate in market or customer allocation, market sharing or bid manipulation.

**Trade sanctions and export control**

Dobbie and its suppliers shall comply with the applicable export control and customs regulations and not purchase materials, components, products, or services from suppliers who are subject to the trade or economic sanctions imposed by the European Union, United Kingdom, the United States, or by any local authorities.

**Sourcing conflict materials**

Dobbie is, and its suppliers must be, committed to sourcing conflict minerals (3TG) supplied to Dobbie with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through supply chain practices. Such minerals originating from conflict affected and high-risk areas may be sourced only in accordance with existing international standards and applicable laws and regulations, and Dobbie and its suppliers must not contribute to human rights abuses, corruption, the financing of armed groups, or similar negative effects.

**Sub-suppliers**

Dobbie suppliers should ensure that their own suppliers adhere to this Business Code of Conduct (or comparable requirements). Suppliers should evaluate and monitor their supply chains, and upon request collect and send the relevant information to Dobbie regarding the supply chain's compliance with this Business Code of Conduct.

Suppliers should inform Dobbie of any violation of this Business Code of Conduct that is noted during audits and assessments of its sub-suppliers.

Dobbie expects the supplier's full co-operation should Dobbie wish to conduct on-site audits at a Dobbie supplier's sub-supplier's premises.

**Monitoring and follow up**

Dobbie encourages suppliers to implement and maintain management systems and standards and to appoint responsible company representatives who shall ensure compliance with this Business Code of Conduct.

Dobbie expects suppliers' co-operation in verifying compliance, e.g. in completing self-assessments and reports and granting Dobbie (or a third party nominated by Dobbie) access to relevant premises and information to conduct on- site audits, including interviewing relevant supplier personnel and access to accurate and complete documentation and records.

Suppliers shall remedy any non-conformity identified without delay.

Supplier failure to comply with this Business Code of Conduct may have negative consequences, including Dobbie suspending or terminating any contract with the supplier.

Dobbie suppliers should further provide access to a protected mechanism for their employees to report possible violations of the principles of this Business Code of Conduct.

**Conclusion**

Dobbie acknowledges that being good is good business and that developing and adhering to this Code of Conduct will not only improve our business but contribute to the greater good of our community.

We believe that by setting this example we can lead others, both businesses and individuals to strive for greatness.