

Kildare Ministries Supplier Code of Conduct

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Kildare Ministries (KM) and its controlled entities are committed to ethical, sustainable 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, including construction works and services, to our ministries.

The Supplier Code of Conduct (Code) describes the minimum expectations in the areas of: integrity, ethics and conduct; conflict of interest, gifts, benefits and hospitality; corporate governance; labour and human rights; health and safety; and environmental management. Suppliers to KM or any of its ministries are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

1. Application of this Code

KM seeks to work with its Suppliers to meet and exceed minimum expectations as outlined in this Code and continuously strives to improve the standard of its business practices. By Supplier, KM means any entity, independent contractors, agents and other business partners that supplies goods or services, including construction works and services, to KM or any of its 13 ministries.

Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier and its related entities. Where the 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 the Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations. KM expects all existing and new Suppliers to commit to the Code. 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.

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

All suppliers are expected to treat those they work with in KM or its ministries with honesty, dignity and respect. This includes maintaining a positive and courteous customer service orientation, speaking professionally and respectfully, and responding to requests for information or assistance in a timely manner.

2. Reporting misconduct, unethical behaviour or suspected corruption

Unless expressly prohibited by law or regulation, KM expects Suppliers, their employees and/or members of the broader community to raise questions, concerns or report any potential or actual violations of this code, laws, regulations, ethical or professional standards that may arise in connection with KM's operations or supply chain.

If a Supplier considers that another Supplier has deviated from or breached their obligations under this Code or that a KM employee has breached this Code, it is expected to report these concerns to one of the following:

(a) in relation to other Suppliers, the relevant Business Manager or Manager of our Community Works, or Chief Financial Officer of KM;

(b) in relation to KM personnel breaching the Code or in relation to serious misconduct of KM personnel or suspected corruption, the relevant School Principal, Manager of Community Works or Executive Director of KM or Chief Financial Officer of KM.

Confidentiality and anonymity (if required) will be maintained as necessary.

KM maintains a Whistleblowing Policy and procedure to facilitate and encourage clear and early noncompliance reporting and mitigation action. KM's confidential and anonymous whistle-blower service may be used by anyone to report suspected unethical, illegal or improper behaviour.

3. Corrective action process

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with the relevant school or community works in relation to the goods or services or the construction works and services, they are providing. If requested by KM, Suppliers should provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance. Suppliers are expected to support KM in reviewing compliance with the Cod

4. Minimum ethical standards for suppliers

A. Integrity, ethics and conduct

KM expects 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.

Business integrity

Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering and modern slavery laws. Suppliers should not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

Record keeping and documentation

Suppliers are expected to 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.

Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring KM into disrepute.

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 KM.

Intellectual property

KM expects Suppliers to respect the intellectual property rights of KM and its ministries and other third parties.

B. Conflict of interest; gifts, benefits and hospitality

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

Conflict of interest

Suppliers must:

(a) declare to the relevant school or community works, any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with KM or any of its ministries; and

(b) avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with KM or any of its ministries. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

Gifts, benefits and hospitality

All KM and its ministries personnel must:

- (a) conduct themselves with the highest standards of integrity, impartiality and accountability; and
- (b) perform public duties without favouritism, bias or for personal gain.

Inappropriate provision of gifts & entertainment should be avoided. When legitimately required in rare cases, they should be of modest value and appropriately timed with full disclosure to the Executive Director, Principal or Manager of Community Works as appropriate.

C. Corporate governance

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

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.

Critical incident management

Suppliers should:

- (a) identify and assess potential critical incident, emergency situations and business continuity risks; and
- (b) develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.

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 KM or any of its ministries' audit, assessment or review.

D. Labour and human rights

KM 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.

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.

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.

Human rights

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

Consistent with relevant modern slavery legislation, Suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

Prevention of involuntary and underage labour

Suppliers are expected 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. 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.

Working hours, wages and benefits

Suppliers must:

(a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;

(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.

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.

E. Health and safety

Worker health, safety and well-being is important to the KM and its ministries. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into its business.

Workplace health and safety management

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

Suppliers are expected to:

(a) manage occupational health and safety hazards; and

(b) provide workers with job-related training and consult with employees in relation to the provision of information and training.

F. Environmental management

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

Environmental impacts

Suppliers are encouraged to comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

(a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;

(b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and

(c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

G. Publicising your relationship with TKM or any of its ministries

Suppliers should not publicise their relationship with TKM or any of its ministries without express and written permission from TKM or the respective ministry. Suppliers may request permission through the contract owner.

TKM or any of its ministries' logos and trademarks are the sole and exclusive property of TKM.

Suppliers do not have the right to use TKM or any of its ministries' trademarks or logos without express written permission from TKM or the respective ministry