

HOSKINS

SUBCONTRACTOR CODE OF CONDUCT

INTRODUCTION

At Hoskins, we have built our reputation over more than a decade through unwavering commitment to honesty, integrity, and excellence in everything we do. As Western Australia's leading built-form, fit out, refurbishment, and remedial specialist, we understand that our success depends not only on our own actions but also on the conduct of our trusted subcontractor partners.

This Subcontractor Code of Conduct outlines the standards we expect from all subcontractors working with Hoskins. These standards reflect our core values and the ethical principles that have earned us the trust of our clients and the respect of our industry.

This Code should be read in conjunction with our other policies, operating standards, procedures, and any site-specific requirements that may apply to your engagement with Hoskins. Where additional requirements exist, you will be notified and provided with relevant documentation.

By engaging with Hoskins, you commit to upholding these standards and contributing to our shared reputation for honest, professional, and exceptional service delivery.

Our Values. Our five core values guide everything we do and form the foundation of this Code.

Collaboration

We accomplish more working together than as individuals.
We foster win-win relationships and expect our subcontractors to work collaboratively with our team, other trades, and all project stakeholders.

Innovation

We embrace creativity, growth, and positive change.
We encourage our subcontractor partners to bring innovative solutions and continuously improve their practices.

Integrity

We act ethically and with integrity in all interactions.
We are honest, respectful, and take responsibility for our actions. This is fundamental to how we operate.

Performance

We deliver high performance with enthusiasm, discipline, and excellence.
We expect our subcontractors to share our commitment to exceeding expectations.

Safety

Everything we do relies on the safety of our workforce and those around us.
Our highest priority is ensuring everyone returns home safely each day.

CORE PRINCIPLES

1. HONESTY AND TRANSPARENCY

Honesty is the cornerstone of our business relationships. We expect all subcontractors to:

- Provide accurate and truthful information in all communications
- Report issues, delays, or concerns promptly and honestly
- Maintain transparency in pricing, variations, and cost reporting
- Never misrepresent qualifications, experience, or capabilities
- Acknowledge mistakes openly and work collaboratively to resolve them

2. PROFESSIONAL CONDUCT

All subcontractors must:

- Conduct themselves professionally and courteously at all times
- Treat all personnel, clients, and third parties with respect and dignity
- Maintain appropriate standards of dress and personal presentation
- Use appropriate language and avoid offensive or inappropriate behaviour
- Represent Hoskins positively when working on our projects

3. QUALITY AND WORKMANSHIP

We are committed to exceptional quality and expect our subcontractors to:

- Deliver work that meets or exceeds specified standards and requirements
- Use appropriate materials, tools, and techniques for each task
- Maintain high standards of workmanship consistent with Hoskins' reputation
- Implement and maintain quality control processes
- Take pride in their contribution to our projects

HEALTH AND SAFETY

Safety is our highest priority. All subcontractors must:

General Safety Requirements

- Comply with all applicable health and safety legislation and regulations
- Follow Hoskins' safety policies and site-specific safety requirements
- Participate in required safety inductions, toolbox talks, and safety meetings
- Report all incidents, near misses, and hazards immediately
- Never work under the influence of drugs or alcohol
- Comply with all PPE requirements

Risk Management

- Conduct risk assessments for all work activities
- Implement appropriate control measures to manage identified risks
- Maintain current Safe Work Method Statements (SWMS)
- Ensure all personnel are competent and appropriately trained
- Hold valid licenses and certifications for all work undertaken

Drugs and Alcohol Policy

Zero Tolerance for Illicit Substances

- Possession, use, or distribution of illegal drugs is strictly prohibited
- Being under the influence of illegal substances at work is grounds for immediate removal
- All personnel must be fit for work and free from impairment

Alcohol Restrictions

It is a condition of your employment that you are prepared, whenever applicable, to travel to any other of our sites or client sites within a reasonable travelling distance. This mobility is essential to the smooth running of the business.

Substance Testing

Hoskins reserves the right to conduct:

- Pre-engagement screening for drugs and alcohol
- Random testing across all subcontractor personnel
- Post-incident testing following accidents or safety breaches
- Reasonable suspicion testing when impairment is suspected
- Return-to-work testing following positive results or rehabilitation

Testing Procedures

- Testing will be conducted by qualified professionals using certified methods
- Results will be treated confidentially and stored securely
- Personnel may be required to cease work immediately if testing positive
- Return to work requires negative test results and clearance from management

ETHICAL CONDUCT

Anti-Bribery and Corruption

Hoskins has zero tolerance for bribery and corruption. Subcontractors must not:

- Offer, give, request, or accept bribes, kickbacks, or improper payments
- Provide gifts or entertainment of inappropriate value to influence business decisions
- Engage in any form of corruption or fraudulent activity
- Make facilitation payments or unofficial payments to expedite services
- Engage in any activity that could reasonably be perceived as corrupt

Gifts and Entertainment

- Gifts should not exceed \$100 in value and must be reasonable and appropriate
- Entertainment should be moderate and for legitimate business purposes
- All gifts and entertainment must be transparent and properly documented
- When in doubt, seek approval from Hoskins management

Conflicts of Interest

Subcontractors must:

- Disclose any potential conflicts of interest immediately
- Avoid situations where personal interests conflict with project obligations
- Not compete directly with Hoskins without prior disclosure
- Maintain independence and objectivity in all business dealings

COMPLIANCE AND LEGAL REQUIREMENTS

All subcontractors must:

- Hold all required licenses, permits, and certifications
- Maintain appropriate insurance coverage as specified in contracts
- Comply with all applicable laws and regulations
- Ensure all employees and sub-subcontractors meet the same requirements

MODERN SLAVERY PREVENTION

Hoskins is committed to preventing modern slavery and human trafficking in all forms within our operations and supply chains. We expect all subcontractors to share this commitment and maintain the highest standards of ethical conduct.

Worker Rights and Conditions

Subcontractors must ensure that all workers (including employees, subcontracted workers, and temporary staff) are:

- **Fairly Compensated:** Paid at least the minimum wage as required by applicable laws and regulations
- **Working Safely:** Provided with safe working conditions that meet all health and safety requirements
- **Free to Leave:** Able to terminate their employment freely without penalty, coercion, or retention of identity documents
- **Document Holders:** In possession of their own identity documents (passports, work permits, etc.) and free to access them at any time
- **Properly Contracted:** Working under legitimate employment arrangements with clear terms and conditions

Supply Chain Management

When engaging with suppliers and sub-subcontractors, you must:

- **Due Diligence:** Conduct appropriate due diligence on all suppliers, particularly those based in high-risk countries
- **Contractual Requirements:** Include modern slavery prevention clauses in all supplier contracts
- **Ongoing Monitoring:** Regularly monitor supplier compliance with modern slavery requirements
- **Transparency:** Maintain transparency about your supply chain, particularly for overseas suppliers and materials
- **Risk Assessment:** Identify and assess modern slavery risks associated with different suppliers and geographic regions

Reporting and Response Procedures

Identification and Reporting If you identify or suspect modern slavery in your operations or supply chain, you must:

- **Immediate Action:** Take immediate steps to address and remedy the situation
- **Report to Hoskins:** Notify Hoskins immediately of any suspected or confirmed instances
- **Cooperate with Authorities:** Report to relevant authorities as required by law
- **Document Actions:** Maintain detailed records of the incident and response actions taken

ENVIRONMENTAL RESPONSIBILITY

We are committed to environmental stewardship and expect subcontractors to:

- Minimise environmental impact through responsible practices
- Properly dispose of waste materials in accordance with regulations
- Use environmentally friendly and sustainable materials and methods where possible
- Report environmental incidents or concerns immediately
- Participate in waste reduction and recycling initiatives

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Subcontractors must:

- Maintain strict confidentiality of all project information
- Protect client information and Hoskins' business interests
- Respect intellectual property rights of all parties
- Use confidential information only for authorised project purposes
- Return all confidential materials upon project completion

EQUAL OPPORTUNITY AND ANTI-DISCRIMINATION

Hoskins is committed to providing equal opportunities and we expect all subcontractors to:

- Treat all people with dignity and respect regardless of background
- Not engage in unlawful discrimination, harassment, or bullying
- Promote inclusive and diverse work practices
- Create a workplace free from offensive, intimidating, or hostile behaviour
- Respect cultural differences and promote harmony

WORKPLACE RESPECT AND CONDUCT

Hoskins is committed to maintaining workplaces that are safe, respectful, and free from inappropriate behaviour.

We expect all subcontractors to foster an environment where everyone is treated with dignity and respect.

Zero Tolerance Policy

We have zero tolerance for:

- Bullying, harassment, or intimidation in any form
- Violence or threats of violence
- Discriminatory behaviour or language
- Sexual harassment or unwelcome conduct of a sexual nature
- Substance abuse or impairment at work
- Any behaviour that creates an unsafe, hostile, or offensive work environment

Bullying and Harassment Prevention

Bullying is repeated, offensive, abusive, intimidating, insulting, or unreasonable behaviour directed towards an individual or group. **Harassment** is unwanted physical, verbal, or non-verbal conduct that affects the dignity of anyone at work.

Subcontractors must ensure their personnel do not engage in:

- Abusive, insulting, or offensive language or comments
- Unjustified criticism or public humiliation
- Physical or emotional threats or intimidation
- Deliberate exclusion from workplace activities
- Spreading misinformation or malicious rumours
- Inappropriate jokes, pranks, or comments
- Unwelcome physical contact or invasion of personal space
- Display of offensive materials, images, or communications

Sexual Harassment Prevention

Sexual harassment includes any unwelcome sexual behaviour that could reasonably be expected to make a person feel offended, humiliated, or intimidated. This includes:

- Inappropriate physical contact or unwelcome touching
- Inappropriate staring, leering, or suggestive gestures
- Sexual comments, jokes, or innuendo
- Sharing sexually explicit materials or communications
- Unwanted invitations for dates or sexual favours
- Intrusive questioning about personal or sexual matters
- Any conduct of a sexual nature that creates a hostile work environment

Violence Prevention

All forms of violence are strictly prohibited, including:

- Physical assault or threats of physical harm
- Aggressive or threatening behaviour
- Intentional damage to property
- Bringing weapons or dangerous items to work sites
- Any behaviour that could reasonably cause fear for personal safety

Discrimination Prevention

Discrimination based on the following characteristics is strictly prohibited:

- Age, disability, or gender identity
- Pregnancy, maternity, or family status
- Race, ethnicity, or national origin
- Religion, belief, or political opinion
- Sex, sexual orientation, or gender expression
- Union membership or activities
- Any other characteristic protected by law

Creating Respectful Workplaces

All subcontractors are expected to:

- Lead by example in demonstrating respectful behaviour
- Promote inclusive and diverse work practices
- Address inappropriate behaviour immediately when observed
- Support colleagues who experience inappropriate treatment
- Contribute to a positive and professional work environment
- Respect cultural differences and individual perspectives

FREEDOM OF ASSOCIATION

We respect the fundamental right of workers to freedom of association and collective bargaining. All subcontractors must:

Worker Rights

- Respect workers' rights to join or form trade unions of their choosing
- Allow workers to engage in collective bargaining where legally permitted
- Not discriminate against workers based on union membership or activities
- Permit worker representation and participation in workplace consultations
- Respect workers' rights to organize and assemble peacefully

Prohibited Actions

Subcontractors must not:

- Interfere with, obstruct, or prevent workers from exercising their association rights
- Retaliate against workers for union membership or legitimate union activities
- Require workers to join or not join unions as a condition of employment
- Favor or disadvantage workers based on their union status or activities
- Use intimidation, coercion, or threats related to union activities

Consultation and Communication

- Engage constructively with legitimate worker representatives
- Maintain open and respectful communication channels with workers
- Consult with workers on matters affecting their employment where appropriate
- Recognize and work with duly elected worker representatives
- Respect established industrial relations frameworks and agreements

WHISTLEBLOWER AND REPORTING PROCEDURE

Hoskins encourages the reporting of suspected bribery, corruption, inappropriate behaviour or other serious misconduct. We are committed to protecting those who report such matters in good faith.

How to Report

Internal Reporting

- Report directly to Hoskins Management
- Email: ethics@hoskinscontracting.com.au
- Phone: 08 9254 4600 (ask to speak with senior management)

What to Report

Report any suspected:

- Bribery or attempted bribery
- Corruption or fraudulent activity
- Kickbacks or improper payments
- Conflicts of interest not properly disclosed
- Any other serious breach of this Code

Protection for Whistleblowers

- Identity protection where legally possible
- Protection from retaliation or detrimental treatment, including further harassment
- Confidential investigation processes
- Regular updates on investigation progress where appropriate
- Support and counselling services if required
- Reasonable workplace adjustments where appropriate

Investigation Process

- All reports will be treated seriously and investigated promptly
- Investigations will be conducted fairly and impartially
- Confidentiality will be maintained to the extent possible
- Regular updates will be provided on investigation progress
- Appropriate action will be taken based on investigation findings

NON-COMPLIANCE AND CONSEQUENCES

Failure to comply with this Code may result in:

- Immediate termination of subcontractor agreements
- Exclusion from future Hoskins projects
- Notification to relevant authorities where appropriate
- Legal action for damages or losses incurred
- Reporting to industry bodies or licensing authorities

We believe in providing opportunities for improvement and will work with subcontractors to address minor issues through:

- Additional training and support
- Enhanced monitoring and supervision
- Corrective action plans with clear timelines
- Regular review meetings to track progress

ACKNOWLEDGMENT AND COMMITMENT

By working with Hoskins, subcontractors acknowledge that they have:

- Read and understood this Subcontractor Code of Conduct
- Committed to complying with all requirements outlined in this Code
- Communicated these requirements to all their personnel and sub-subcontractors
- Implemented appropriate systems and processes to ensure ongoing compliance
- Agreed to participate in any required training or orientation programs

CONTACT INFORMATION

For questions about this Code or to report concerns:

Hoskins Contracting Pty Ltd

Address: Level 1, Suite 8, 250 Oxford Street, Leederville WA 6007

General Inquiries: 08 9254 4600

Email: info@hoskinscontracting.com.au

Ethics Reporting: ethics@hoskinscontracting.com.au

Website: hoskinscontracting.com.au

Building excellence through integrity, collaboration, and honest partnerships.

This Code of Conduct is effective from July 2025 and supersedes all previous versions. Hoskins reserves the right to update this Code as required.



Brett Hoskins
Managing Director