

Vintian Construction is committed to responsible, ethical, and transparent supply chain practices. This Policy outlines Vintian's expectations for the ethical engagement and management of vendors and provides assurance to clients, regulators, and stakeholders that Vintian works with reputable parties and manages supply chain risks appropriately.

This Policy applies to all vendors engaged by Vintian, including but not limited to suppliers, contractors, subcontractors, consultants, labour hire providers, service providers, and other third parties. This Policy applies to all procurement and supply chain activities undertaken on behalf of Vintian, including work performed at Vintian facilities, client sites, and project locations.

Our Commitment

Vintian is committed to:

- Conducting business ethically, lawfully, and transparently.
- Engaging reputable and competent vendors.
- Supporting fair, safe, and respectful working conditions.
- Preventing modern slavery, bribery, corruption, and unethical practices.
- Supporting local and compliant businesses where practicable.
- Managing supply chain risks proportionate to the nature and scale of work.

Legal and Ethical Compliance

- Vendors must comply with all applicable Australian laws, regulations, standards, and relevant industry codes of practice.
- Vintian expects vendors to operate in a manner consistent with recognised ethical, social, and environmental best practice.
- Failure to meet legal or ethical obligations may result in corrective actions, suspension, or termination of engagement.

Human Rights and Modern Slavery

- Vintian respects human rights and is committed to preventing modern slavery practices within its supply chain.
- Vintian does not tolerate forced, bonded, or compulsory labour, child labour, human trafficking, or any form of exploitation.

Vendors must:

- Provide safe and healthy working conditions.
- Pay lawful wages and entitlements.
- Respect freedom of association and diversity.
- Treat workers with dignity and respect.

Vintian may undertake reasonable due diligence, verification, or audits to assess vendor compliance with human rights and labour standards.

Health, Safety and Environmental Responsibility

- Vendors must comply with all applicable work health and safety and environmental legislation, manage risks associated with their activities, and follow Vintian and client site requirements.
- Incidents, hazards, and unsafe conditions must be reported promptly.
- Vintian reserves the right to intervene or suspend work where unacceptable safety or environmental risks are identified.

Ethical Procurement, Bribery and Corruption

- Vintian is committed to ethical procurement practices and does not tolerate bribery, corruption, facilitation payments, or improper inducements.
- Vendors must not offer, solicit, or accept any gift, benefit, or advantage intended to improperly influence a business decision.
- Procurement decisions are based on merit, capability, value, risk, and alignment with Vintian's ethical standards.

Fair Dealing and Integrity

- Vintian is committed to fair, transparent, and objective dealings with vendors.
- Vendors are expected to act honestly and in good faith, protect Vintian and client property and information, avoid conflicts of interest (or disclose them promptly), and support continuous improvement and responsible cost management.

Local and Reputable Vendor Engagement

- Vintian seeks to engage local vendors where practicable and supports participation within the formal economy.

SUPPLY CHAIN MANAGEMENT POLICY



- Vendor selection and ongoing engagement may consider capability, experience, safety and environmental performance, ethical and legal compliance, and overall risk profile.

Due Diligence and Monitoring

- Vintian may apply proportionate due diligence measures to assess vendor suitability and ongoing performance, including pre-engagement checks, monitoring activities, audits, and investigation of complaints or concerns.
- Vendors are expected to cooperate with reasonable due diligence processes.

Alignment with Code of Conduct

- All vendors are expected to comply with Vintian's Code of Conduct, as applicable to third parties, in addition to the requirements of this Policy.
- This Policy operates alongside, and does not replace, Vintian's internal governance, WHS, and ethical frameworks.

Reporting and Non-Compliance

- Vendors and stakeholders are encouraged to report suspected misconduct, unethical behaviour, or breaches of this Policy.
- Vintian will investigate concerns fairly and may take action including corrective actions, suspension of work, or termination of contracts or engagements.

We encourage all of our stakeholders to contribute towards the development of this Policy and to challenge any non-compliant or ineffective practices.

APPROVED: 17 July 2026
Policy NO.: VIN-COR-POL-0008
Revision No: 1

This Policy will be reviewed every 12mths in our Management Review Meeting (MRM) to ensure its appropriateness, accuracy, and value.

A handwritten signature in blue ink, appearing to read "Srda Deric", is written over a horizontal line.

Srda Deric
Managing Director