

CODE OF CONDUCT



**POWERING FUTURES,
CREATING LEGACIES.**



ACKNOWLEDGEMENT OF COUNTRY

The BMD Group acknowledges the Traditional Custodians of the lands in which we operate and pay respect to Elders past and present, and recognise their enduring connection to land, sea and community. As we continue to build and develop across Australia, we remain committed to learning from and working respectfully alongside Aboriginal and Torres Strait Islander communities, contributing positively to their wellbeing and prosperity.



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A construction worker wearing a white hard hat and a high-visibility safety vest with reflective stripes is looking down at a large piece of machinery. The background shows a construction site with a large pile of earth. The entire image is overlaid with a blue tint.

**WE'RE DELIVERING
COLLABORATIVE
INFRASTRUCTURE
SOLUTIONS THAT
CONNECT AND
TRANSFORM
COMMUNITIES.
THAT'S THE
POWER OF BMD.**

1 A MESSAGE FROM THE CEO

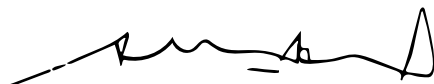
BMD is Australia's leading integrated engineering, construction and urban development business, with foundations built on the family values that underpin our unique, collaborative approach. Our reputation is grounded in our culture, our values, our commitment to our people and our focus on delivering innovative infrastructure solutions that connect and transform communities. BMD is committed to continually and without compromise, reinforce our reputation in the way in which we conduct business.

At BMD, our purpose is to power futures and create legacies. Every project we deliver, every community we work with and every decision we make is guided by this purpose. It's what drives us to leave a lasting impact.

Our Code of Conduct provides a framework within which to make the right decisions at work. It reflects who we are, how we work and the standards we uphold. It guides our decisions, shapes our behaviour and brings our values to life. Each of us has a role in protecting BMD's reputation by doing what is right, not just what is required.

This Code applies to all of us. If you have a question or ever believe that Our Code may have been contravened, please talk to your manager or HR representative.

Together, we will continue to uphold the standards that define BMD and ensure we leave a legacy we can all be proud of for our people, our clients and the communities in which we operate.



Scott Power

**GROUP DIRECTOR
CHIEF EXECUTIVE OFFICER**



2 BMD GROUP CODE OF CONDUCT (“OUR CODE”)

Our Code describes the behaviours and minimum standards expected of anyone working for or on behalf of the BMD Group (BMD). Some standards reflect legal obligations; others reflect who we are as a company and the expectations of our clients and communities.

Our Code applies equally to all people who work for BMD, as an employee, director, or people working under contract when they act for or represent BMD.

Where BMD is operating in a joint venture or similar contract, we require that the standards of behaviour contained in Our Code be observed. We seek to work with third parties who share our values and standards of conduct similar to Our Code. We expect our partners, subcontractors and suppliers are guided by these principles.

Nothing in Our Code restricts any person from exercising rights under applicable laws.



FITZROY RIVER BRIDGE, WESTERN AUSTRALIA



3 OUR PURPOSE AND VALUES

Our purpose is to power futures and create enduring legacies through a commitment to collaboration. Our values of Family, Driven, Empowered and Collaborative guide our everyday decisions.

A QUICK TEST: WHEN FACED WITH A DECISION, ASK:

- ✓ Is it legal and consistent with our policies and procedures?
- ✓ Is it aligned with our values and the spirit of Our Code?
- ✓ Would I be comfortable if this was reported in the media or I explained it to family or a colleague?
- ✓ Could it harm people, the environment or BMD's reputation?



ACROSS OUR BUSINESS, WE VALUE

FAMILY

Our future is powered by the same family values we were founded on. We value each other, we work as a team, and we build everything from strong relationships and respect.

DRIVEN

Hard work will triumph as we persist through obstacles and seek continuous improvement. We celebrate effort as much as achievement because it's the effort that propels performance.

EMPOWERED

We empower our people to take initiative through a supportive environment. Everyone has the opportunity to achieve their potential.

COLLABORATIVE

Together, we solve challenges and build lasting, trusted relationships with clients, suppliers and partners to achieve shared success and long-term impact.

4 SPEAKING UP AND REPORTING CONCERNS

If you see or suspect conduct that may breach Our Code, a law or a company policy, raise it early.

HOW TO RAISE A CONCERN

You can speak with your supervisor/manager, Human Resources or the Group Executive Director - People and Process. BMD also provides an external Whistleblower Hotline where you can confidentially and, if you wish, anonymously report serious misconduct.

WHISTLEBLOWER HOTLINE

Australia: 1800 647 266

International (UK, Philippines, U.S.): +61 1800 647 266

The hotline should not be used for personal employment grievances unless they involve misconduct covered by whistleblowing laws.

5 PENALTIES FOR BREACH OF OUR CODE

BMD treats breaches of Our Code seriously. Consequences may include coaching, disciplinary action, termination of employment or engagement, and referral to authorities where unlawful conduct is suspected.



6 OUR CONDUCT PRINCIPLES

6.1. Maintaining a safe and healthy workplace

BMD'S COMMITMENT

Safety always comes first. BMD is committed to providing a safe and healthy workplace for everyone. We believe all work can be done safely and empower every person to stop or refuse work they believe is unsafe. We provide the systems, training and support needed to identify, assess and control risks, and to report hazards and incidents promptly. Safety is a shared responsibility, and together we protect our people, our teams, and our projects.

Key Policy: [Safety Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ be fit for work (physically, emotionally and mentally)
- ▶ stop all unsafe or potentially unsafe work and promptly report concerns to my manager/supervisor
- ▶ identify, assess, eliminate or control hazards using risk protocols
- ▶ know and implement emergency procedures when required.

6.2. Working with care in our environment

BMD'S COMMITMENT

BMD works to prevent harm to the environment and use resources efficiently. We comply with environmental laws and approvals, and seek opportunities to reduce waste, emissions and our environmental footprint.

Key Policy: [Environmental Policy, and Sustainability and Sustainable Procurement Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ use resources efficiently and seek sustainable improvements
- ▶ know and comply with environmental legislation
- ▶ exercise care to avoid environmental harm
- ▶ promptly report any environmental harm or risks.

6.3. Compliance with laws and regulations

BMD'S COMMITMENT

Compliance underpins our social licence to operate. BMD provides guidance, policies and training to help everyone understand and meet their legal obligations.

MY RESPONSIBILITY

I WILL:

- ▶ know and follow the laws, regulations and policies relevant to my role
- ▶ seek advice from Legal or Compliance whenever I am uncertain about legal or regulatory requirements
- ▶ cooperate fully with any internal or external investigation or audit.

6.4. Preventing bribery and corruption

BMD'S COMMITMENT

BMD prohibits bribery and kickback payments in any form (direct or indirect).

Key Policy: [Serious Misconduct Disclosure and Whistleblower Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ only use business practices which strictly comply with BMD's policies and procedures
- ▶ never offer, give, request or accept anything of value that may influence a decision
- ▶ report any actual or suspected improper business practices.

6.5. Exercising care with gifts, discounts and hospitality

BMD'S COMMITMENT

BMD ensures that business hospitality and gifts are modest, infrequent, lawful and transparent. We require disclosure and proper recording of gifts and benefits.

Key Policy: [Gifts and Benefits Policy and Delegation of Authority](#)

MY RESPONSIBILITY

I WILL:

- ▶ exercise care with the exchange of gifts and hospitality
- ▶ disclose and record any gifts or benefits received, in accordance with the BMD policies and procedures
- ▶ seek guidance when cultural sensitivities are involved.

6.6. Avoiding conflicts of interest

BMD'S COMMITMENT

BMD avoids situations where personal interests conflict (or appear to conflict) with the interests of the company. We require disclosure and management of any actual or potential conflicts.

Key Policy: [Conflict of Interest Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ act in BMD's best interests and avoid actions that favour my own personal or financial interests or gain
- ▶ immediately disclose any potential or actual conflicts of interest
- ▶ remove myself from decisions or actions where a conflict exists.

6.7. Working with our business partners

BMD'S COMMITMENT

BMD engages with business partners who share our standards. We conduct due diligence and monitor performance to ensure compliance.

Key Policy: [Commercial Project Standard, Joint Venture Standard, Modern Slavery Statement and Delegation of Authority.](#)

MY RESPONSIBILITY

I WILL:

- ▶ conduct due diligence before engaging business partners
- ▶ monitor business partners using BMD's risk and compliance management frameworks
- ▶ accurately report all agent fees and services
- ▶ seek guidance when appointing business partners or agents.

6.8. Competing fairly and ethically

BMD'S COMMITMENT

BMD competes vigorously but fairly, avoiding anti-competitive conduct and maintaining ethical standards in all interactions.

Key Policy: [Sustainability and Sustainable Procurement Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ avoid anti-competitive behaviour and maintain independence
- ▶ exercise care at industry and trade meetings, maintaining ethical and honest communications.

6.9. Using company assets and technology responsibly

BMD'S COMMITMENT

BMD provides assets and technology (including systems, data, equipment and intellectual property) for legitimate business purposes and protects them from loss, misuse and unauthorised access.

Key Policy: [Information Technology Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ use BMD assets and technology only for legitimate business purposes
- ▶ protect assets from loss, misuse, theft or unauthorised access
- ▶ follow cybersecurity and acceptable use requirements.

6.10. Maintaining complete, accurate and timely business records

BMD'S COMMITMENT

BMD maintains complete, accurate and timely records that reflect underlying transactions and events and complies with document retention requirements.

Key Policy: [Financial Management Standard and Delegation of Authority](#)

MY RESPONSIBILITY

I WILL:

- ▶ ensure information accurately reflects underlying transactions
- ▶ not misstate or falsify underlying facts and figures or modify records to mislead others
- ▶ promptly report any significant operational or financial developments
- ▶ retain business records as required by law.

6.11. Respecting and protecting privacy and confidential information

BMD'S COMMITMENT

BMD respects privacy and handles personal and confidential information lawfully and securely.

Key Policy: [Privacy Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ protect personal and confidential information from misuse or unauthorised disclosure
- ▶ collect and use personal information only for authorised business purposes
- ▶ dispose of information securely when no longer required.

6.12. Promoting respectful workplace behaviours

BMD'S COMMITMENT

BMD builds a safe, respectful and inclusive workplace by valuing diversity and managing conflict productively.

Key Policy: [Respectful Workplace Behaviour Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ treat others fairly and with respect
- ▶ not engage in bullying, harassment, discrimination or victimisation (directly or indirectly)
- ▶ report any inappropriate, offensive or unlawful behaviour.

6.13. Encouraging community and Indigenous relations

BMD'S COMMITMENT

BMD partners with communities (particularly in regional and remote areas) to provide opportunities and respect cultural heritage.

Key Policy: [Stretch Reconciliation Action Plan, and Sustainability and Sustainable Procurement Policy](#)

MY RESPONSIBILITY

I WILL:

- ▶ respect local business needs and customs
- ▶ value and preserve cultural heritage affected by our operations
- ▶ report any actual or suspected violations of cultural heritage laws.

6.14. Respecting and upholding human rights in business

BMD'S COMMITMENT

BMD respects human rights and works to prevent, detect and address risks such as forced labour, human trafficking and exploitation in our operations and supply chain. We take a zero tolerance approach to all forms of modern slavery.

Key Policy: [Modern Slavery Statement](#)

MY RESPONSIBILITY

I WILL:

- ▶ support and integrate business practices that uphold human rights
- ▶ report any actual or suspected human rights violations.

6.15. Responsible sponsorships and charitable donations

BMD'S COMMITMENT

BMD invests in local projects and supports charitable causes to create a positive and lasting impact that reflects our core values and dedication to social responsibility.

Key Policy: [Sustainability and Sustainable Procurement Policy, and Delegation of Authority](#)

MY RESPONSIBILITY

I WILL:

- ▶ only sponsor initiatives or organisations aligned with Our Code
- ▶ always ensure authorised sponsorships or donations are made in accordance with BMD policies and procedures.

7 ROLES AND RESPONSIBILITIES



Everyone:

Know and follow Our Code and applicable policies, complete required training and speak up early.

Leaders:

Set the tone, model positive behaviour, enable speaking up, manage conflicts and ensure team competence and resourcing.

8 TRAINING AND CERTIFICATION

Employees may be required to complete training and to acknowledge Our Code on commencement and periodically thereafter as a refresher.



9 RELATED POLICIES

All policies referenced in Our Code are available on the BMD Intranet or through the Business Management Systems (BMS) portal. Employees are encouraged to access these platforms for the most current versions and further guidance.

Policy / Standard Name	Purpose
Safety Policy	Sets out requirements for maintaining a safe workplace.
Environmental Policy	Outlines environmental responsibilities and compliance.
Gifts and Benefits Policy	Governs acceptance and disclosure of gifts and benefits.
Delegation of Authority	Defines approval levels and authorities.
Conflict of Interest Policy	Sets out obligations to avoid and disclose conflicts.
Commercial Project Standard	Requirements for project commercial management.
Modern Slavery Statement	Affirms commitment to human rights in business.
Respectful Workplace Behaviour Policy	Promotes respectful, inclusive and safe workplaces.
Privacy Policy	Governs collection and use of personal information.
Information Technology Policy	Sets standards for IT use and cybersecurity.
Sustainability and Sustainable Procurement Policy	Integrates sustainability into procurement practices.
Serious Misconduct Disclosure and Whistleblower Policy	Explains reporting and protection for whistleblowers.

10 GOVERNANCE OF THIS DOCUMENT

Our Code is maintained by the Compliance team and endorsed by senior leadership. It will be reviewed periodically to ensure alignment with evolving business needs, legal requirements and regulatory obligations.



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