

# Supplier Code of Conduct

Landcom

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## Contents

|  |    |
|--|----|
| Message from the Chief Executive Officer.....  | 3  |
| Purpose.....   | 4  |
| Application .....  | 4  |
| Defined Terms.....   | 4  |
| Why do we need a Code of Conduct? .....  | 5  |
| Guiding principles.....  | 5  |
| Act with honesty and integrity in everything we do.....                                | 5  |
| Conflicts of interest.....   | 6  |
| Gifts and benefits.....  | 7  |
| Build relationships, treating all others with respect and dignity.....                 | 7  |
| Ensure the safety and wellbeing of ourselves and others .....                          | 8  |
| Respect confidentiality and use information appropriately.....                         | 8  |
| Confidentiality of information.....  | 9  |
| Protecting personal information.....   | 9  |
| Protecting our intellectual property.....  | 9  |
| Misuse of information.....   | 9  |
| Security and management of records and information.....                                | 9  |
| Signing documentation .....  | 10 |
| Media or press communication .....   | 10 |
| Social media.....  | 10 |
| Lobbyists.....   | 10 |
| Use and manage public resources economically and efficiently.....                      | 10 |
| Delegations of Authority.....  | 10 |
| Use of resources.....  | 10 |
| Procurement .....  | 11 |
| Modern Slavery Act 2018.....   | 11 |
| Hold each other accountable to the Code of Conduct.....                                | 11 |
| Addressing suspected violations.....   | 11 |
| Reporting breaches of the Code.....  | 11 |
| Reporting bankruptcy, serious criminal offences and other non-compliance matters ..... | 12 |
| Reporting suspected wrongdoing .....   | 12 |
| What happens if you breach the Code? .....   | 13 |
| Document Control Table.....  | 14 |

## **Message from the Chief Executive Officer**

As the NSW Government's land and property developer, Landcom must do the right thing at all times – it is the way we conduct business. For this reason, we set the bar high in the way we approach our work to ensure that we meet the highest possible standards of ethical conduct.

As a Landcom Supplier, you are a part of the Landcom team and your actions and conduct, and those of your Staff when working on Landcom projects or matters, are a reflection on Landcom. This Code of Conduct outlines the commitments you make when you agree to work for or on behalf of Landcom. It guides you to navigate the framework of policies, legislation, principles and practices so you always make the best decision.

Being a valued member of the Landcom team, Landcom requires you to incorporate the principles of the Code and our culture into the work that you do for or on behalf of Landcom. Being part of the Landcom team also means you have support around you – we are all responsible for enabling each other to put these principles into practice.

This Code is issued with the full support of the Landcom Executive Committee, who take adherence to the Code very seriously. We rely on all Suppliers to be diligent and committed to upholding the Code. This includes addressing any concerns or violations as soon as they arise, without exception. It also means maintaining an environment which enables people to raise concerns without fear of retribution. We will not tolerate any negativity towards those who raise legitimate compliance concerns in good faith.

I thank you for upholding the Code and using it to build on the strong reputation of Landcom.

John Brogden AM

CEO

## Purpose

The Supplier Code of Conduct is one of the ways we put our Landcom values into action to achieve our strategy. It sets the expectation that everyone who works for or on behalf of Landcom demonstrates the highest standards of conduct and ethics in the performance of their duties.

This Code guides you through the factors you need to consider in how you approach the work that you undertake for Landcom. It is important that you understand and follow this Code to preserve Landcom's reputation for ethical and principled behaviour.

## Application

This Supplier Code of Conduct sets out our expectations and applies Landcom values to our third-party Suppliers, consultants and contractors.

Where the Supplier is a corporate entity or organisation, the corporate entity or organisation must ensure that its Staff and/or employees who undertake work related to Landcom comply with this Code.

Failure to meet this Code by you or your employees can result in termination of your relationship with Landcom.

## Defined Terms

| Term                   | Definition  |
|------------------------|---|
| CEO                    | means Landcom's Chief Executive Officer   |
| Code, the Code         | means this Supplier Code of Conduct   |
| Conflict of Interest   | means circumstances in which your personal interests may conflict or appear to conflict with your public duty. It also exists when a reasonable person might perceive that your personal interests could be favoured over your public duties and you competing loyalties influence you (consciously or otherwise) to pursue a personal benefit for you, your friends, your family or any other parties at the expense of Landcom. In practice, this requires a connection or overlap between those interests and duties |
| EGM                    | means an Executive General Manager at Landcom   |
| ExCo                   | means Landcom's Executive Committee   |
| GIPA Act               | means the <i>Government Information (Public Access) Act 2009 (NSW)</i>  |
| Intellectual Property  | means work produced in the course of employment with Landcom which is Intellectual Property owned by Landcom. This includes written works, the creation of templates, plans, concepts or ideas, training materials, manuals, brochures or other subject matter (including any software, products and services)  |
| Landcom Representative | means the Staff member nominated as your contact person within Landcom  |
| Our or ours            | means Landcom and what belongs to, or is unique to our organisation   |
| Policy/Policies        | refers to a Landcom policy document and any supporting documents including but not limited to plans, procedures or frameworks, all sitting within Landcom's policy framework  |

| Term                     | Definition  |
|--------------------------|---|
| <b>PID Act</b>           | means the <i>Public Interest Disclosures Act 1994 (NSW)</i>   |
| <b>Staff</b>             | includes the Board, the CEO, all permanent and temporary employees and contingent workers engaged by Landcom. This term is used for the purposes of this Policy |
| <b>Standing Order 52</b> | means an order to produce documents in relation to a particular decision of the NSW Government that has become a matter of broad public interest                |
| <b>Supplier</b>          | means Contractors, subcontractors and consultants engaged or completing work for or on behalf of Landcom  |
| <b>We</b>                | Means Landcom collectively as a corporation   |
| <b>You or you</b>        | means a Supplier (including the Staff of Suppliers) to whom this Code applies   |

## Why do we need a Code of Conduct?

### Guiding principles

The Supplier Code of Conduct operates on six guiding principles that inform every decision and action you take when working for or on behalf of Landcom.

1. Act with honesty and integrity in everything we do;
2. Build relationships, treating all others with respect and dignity;
3. Ensure the safety and wellbeing of ourselves and others;
4. Respect confidentiality and use information appropriately;
5. Use and manage public resources economically and efficiently; and
6. Hold each other accountable to this Code.

### Act with honesty and integrity in everything we do

The only way to uphold the trust and confidence in Landcom by our shareholders, stakeholders and the general public is, for each member of the Landcom team, to always act with honesty and integrity. This includes complying with any relevant legislative, industrial and administrative requirements and any lawful direction made by a person with the authority to give such a direction.

Landcom expects Suppliers, in delivering the goods and services required by Landcom, to comply with the principles and values set out in this Code. These include expectations that all Landcom Suppliers will:

- Meet their contractual obligations to Landcom and their own Suppliers;
- Comply with all applicable laws and regulations in relevant jurisdictions and respond promptly and appropriately to any actual or potential breaches;
- Manage their risk, governance, legal and compliance appropriately;
- Encourage the principles outlined in this Code in their own workplace and ensure supporting practices become standard business practice;

- Treat their Staff fairly and lawfully;
- Share these principles with all their Staff or contractors who are involved in providing services to Landcom, including training and guidance if required;
- Influence their own supply chain and related third parties to adopt and to demonstrate commitment to these or similar principles; and
- Verify compliance on request, through self-assessment, by providing supporting information/evidence and facilitating site visits or audits.

In the event that a Supplier is unable or becomes aware that it may not be able to comply with any of the expectations in this Code, the Supplier must contact Landcom immediately and work with us as required to address the issue.

### Conflicts of interest

Handling actual, potential or reasonably perceived conflicts of interest ethically, transparently and honestly is essential to upholding public trust and confidence in Landcom and the NSW Government. Landcom is committed to providing a fair, ethical and accountable environment for the conduct of its business but the integrity and fairness of Landcom's decisions and actions can be undermined where conflicts of interest are not identified and appropriately managed.

A conflict of interest can be:

- **Actual** – where a person's performance of their work for, or on behalf of, Landcom may be unduly influenced by competing secondary interests;
- **Perceived or apparent** – where it could be reasonably seen that competing or private interests could improperly influence the performance of the work you are undertaking for, or on behalf of, Landcom; or
- **Potential** – where private interests have the potential to conflict or unduly influence the work you may undertake for or on behalf of Landcom in the future.

If a conflict of interest arises, be it actual, potential or reasonably perceived, you need to declare it to your Landcom Representative at the earliest opportunity. Your Landcom Representative will provide advice and guidance in respect to managing the conflict in accordance with Landcom's *Handling Conflicts of Interest Policy*. This action will help to ensure that all decisions made on behalf of Landcom lead to the best possible outcomes and reduce the risk of corrupt conduct.

Possible activities that may give rise to a conflict of interest include:

- **Dealings in land or other business activities that relate to Landcom's projects** – please inform your Landcom Representative if you are considering purchasing land in a Landcom project where you are currently undertaking or have recently undertaken work for or on behalf of Landcom;
- **Competing Employment** – If you are considering engaging in a business activity outside your engagement with Landcom which could adversely affect performance of your engagement with Landcom or give rise to an actual, potential or reasonably perceived conflict of interest, you should inform your Landcom Representative. Examples of this include if you wish to provide services to a counterparty in a Landcom transaction or be engaged by a prospective tenderer to a Landcom process where you are currently or have previously advised Landcom. Landcom will review and determine what actions could be put in place; or

- **Participation in political, volunteering or other activities** – If engaging in these activities interferes with your engagement with Landcom, you should consider informing your Landcom Representative. Landcom will then consider the nature of the issue, your engagement with Landcom, the extent of your participation, and your public prominence.

### **Gifts and benefits**

Giving and receiving gifts, benefits or hospitality may be perceived as having an undue influence on the work we undertake and has the potential to compromise current and future impartial decision making.

While most gifts and benefits are intended simply as a memento or a small token of appreciation, sometimes a gift or benefit may be offered to influence you, in your role as a Supplier, to make a decision, or to provide a favour that will advance the interests of the giver, either now or in the future.

Suppliers must not offer, provide, authorise, request or receive a bribe or anything which may be viewed as a bribe (including any secret commission) either directly or indirectly or otherwise through any third party, or perform your functions improperly in anticipation or in consequence of a bribe, regardless of whether or not a benefit is given or received by another person, including public officials, and regardless of the value of the benefit.

If you are offered a substantial gift, benefit or hospitality or bribe (i.e. anything given in order to persuade you to act improperly in undertaking work for or on behalf of Landcom), you must:

- Refuse it;
- Indicate it is not appropriate and that you are obliged to report the offer to Landcom; and
- Immediately report the matter to your Landcom Representative, the Fraud Control and Corruption Prevention Coordinator [fraudcontrol@landcom.nsw.gov.au](mailto:fraudcontrol@landcom.nsw.gov.au) or the CEO.

Attempts to bribe Staff or Suppliers and/or the acceptance of a bribe, is corrupt conduct and must be reported. It may also be referred to the NSW Independent Commission Against Corruption or the NSW Police, as it may constitute a criminal offence.

### **Build relationships, treating all others with respect and dignity**

Landcom's success is built on the relationships we form and our trusted reputation. The diversity of thought, ability, and experience we gain through these relationships improves our decision-making and enables us to make a difference through the work we do.

It is up to all of us to continually build relationships and earn that trust by treating stakeholders and members of the public with dignity and respect. As a Supplier, your actions and conduct are a reflection on Landcom. Please ensure that every interaction, communication and action you take when undertaking work for or on behalf of Landcom increases trust, builds relationships, and in no way prejudices the operations, security or reputation of Landcom.

Landcom will not tolerate any form of discrimination, harassment and bullying. This includes no tolerance for the use of obscene or suggestive language, sexual banter, and the mistreatment of any person in a position of vulnerability.

If you encounter vulnerable members of the community, you must treat them with the utmost respect and dignity, taking special care in your interactions with them.

You are required to report any incident or allegation of inappropriate conduct you observe at a Landcom workplace or in relation to the work you are undertaking for or on behalf of Landcom, to your Landcom Representative. If you need help or advice, speak with your Landcom Representative.

### **Ensure the safety and wellbeing of ourselves and others**

Landcom is in the business of creating vibrant, thriving communities that look after the wellbeing of its residents. Landcom believes Health, Safety and Environment is of fundamental importance. We aim to ensure, so far as reasonably practicable, that all Landcom operations are conducted in a manner which safeguards the health, safety and welfare of its Staff, Suppliers, customers and the community who are affected by Landcom operations.

One element in achieving this goal is to ensure that our delivery partners (which includes Suppliers) deliver health and safety excellence on all Landcom projects. Safety is paramount and therefore everyone should protect their own safety and that of others in the work environment and the public arena. All delivery partners must abide by relevant health and safety legislation when conducting work for and on behalf of Landcom.

While at a Landcom workplace, work site or event, as our Supplier you must ensure that:

- No work is conducted when you are impaired by the use of alcohol, illicit drugs, or prescribed or over the counter medication;
- No alcohol and/or illicit drugs are consumed when in control of or operating a vehicle, machinery, plant or equipment;
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substance while undertaking your engagement with Landcom is strictly prohibited;
- Behaviour should be courteous towards the public, Staff, Landcom's customers and people from other contractors and government agencies, and should not bring Landcom into disrepute; and
- Aggressive and violent behaviour is strictly prohibited.

### **Respect confidentiality and use information appropriately**

Owning a position of leadership and innovation means Landcom attracts a lot of attention from people wanting to find out how we deliver our projects. We need to manage this carefully as sharing certain kinds of information prematurely can have a negative impact on our projects, our reputation and our competitive advantage, and can prove costly to Landcom.

As a Supplier to Landcom, you may have access to confidential information during the course of the work you undertake for or on behalf of Landcom. You have a responsibility to:

- Not reveal confidential or sensitive material;
- Properly secure, label, and (when appropriate) dispose of sensitive information and confidential material;
- Only accept confidential, sensitive or personal information if all parties have previously signed an appropriate agreement to enable the sharing of information; and



- Safeguard the personal, sensitive and confidential information received from others, particularly under non-disclosure agreements.

If you are uncertain, err on the side of caution to ensure you do not disclose information inappropriately and ask for help from your Landcom Representative.

### **Confidentiality of information**

At all times, you must maintain the confidentiality of any official information and documents you have access to which are not published or normally made available to the public.

The only exceptions to this confidentiality will arise where Landcom or you are compelled by law to deliver confidential information to a court, authority, agency or other third party or where the disclosure is otherwise required by legislation or by the public interest, such as the GIPA Act, the PID Act or a call for papers under a Standing Order 52.

This principle of confidentiality applies equally to ex-Suppliers in relation to confidential information acquired during engagement with Landcom and its predecessor organisations.

### **Protecting personal information**

Landcom takes the privacy of its Staff, Suppliers, members of the public and stakeholders seriously and will manage and protect the personal and health information it handles in accordance with the *Privacy and Personal Information Protection Act 1998* (NSW) and the *Health Records and Information Privacy Act 2002* (NSW) and Landcom's *Privacy Policy*.

All enquiries relating to privacy must be referred to Landcom's Right to Information Officer who can be contacted by email on [privacy@landcom.nsw.gov.au](mailto:privacy@landcom.nsw.gov.au).

### **Protecting our intellectual property**

We expect you to comply with your obligations relating to Intellectual Property in accordance with your contract with Landcom.

### **Misuse of information**

You must not misuse the access gained through your engagement with Landcom, or other government-held information, to secure future employment advantages within or outside Landcom, or to benefit any other person or organisation, including those who have worked for Landcom in the past.

### **Security and management of records and information**

You are to ensure that any information gained through your engagement with Landcom in any form (printed or electronic) cannot be accessed by unauthorised persons and that sensitive information is only discussed with persons (inside or outside Landcom) who are authorised to have access to it.

You must ensure you create and maintain full and accurate records of your engagement with Landcom, that these records are provided to Landcom as required, stored appropriately and not destroyed inappropriately. Please ask your Landcom Representative if you require more information regarding this.

### **Signing documentation**

Suppliers are not permitted to sign any documentation for or on behalf of Landcom unless specifically authorised to do so in your contract of engagement or in writing by Landcom.

### **Media or press communication**

You are not to communicate with the media/press concerning Landcom's business activities unless expressly authorised in writing by Landcom to do so. Any media enquiries should be first directed to your Landcom Representative who will then consult with the Senior Manager Media & Stakeholder Relations.

### **Social media**

Suppliers should consider the risks, benefits and implications that may arise from making private statements that relate to their work on Landcom projects on social media platforms. Even positive and supportive comments can become contentious when engaging in personal use of social media. Suppliers must not:

- Post official Landcom content unless we specifically contract you to do so. You can, however, repost, or retweet Landcom posts, material or comment without substantial or meaningful change as part of showing affiliation or support for the Corporation;
- Purport to be communicating on behalf of Landcom in an official capacity; and
- Comment or post any material that might cause damage to Landcom or the NSW Government's reputation.

### **Lobbyists**

Landcom complies with the *NSW Government Lobbyist Code of Conduct* in connection with the lobbying of NSW Government officials and will only engage with professional (third-party) lobbyists if they are listed on the *NSW Electoral Commission's Register of Lobbyists*. Please advise your Landcom Representative if you are contacted by a lobbyist.

### **Use and manage public resources economically and efficiently**

Landcom's ability to deliver projects and create thriving communities depends on how well we manage our resources.

### **Delegations of Authority**

Suppliers do not have any delegation of authority to make decisions regarding the use of Landcom's financial resources.

### **Use of resources**

Treat Landcom property and assets with care and ensure they are secured against theft, loss, damage or misuse. You also need to ensure the use of any property or assets in relation to the work you undertake for and on behalf of Landcom is lawful, appropriate and ethical and does not create a risk or liability for Landcom.

Avoid any personal use of Landcom resources and equipment such as computers and phones.

Use of Landcom facilities and equipment, including software, for private use or for private financial gain is prohibited. The only exception is where you have been formally contracted to supply services to Landcom. In this case, the use of Landcom's facilities must be specified in the contract.

## Procurement

If your engagement with Landcom involves the procurement of goods or services which will be directly charged to Landcom in addition to the agreed fees payable to you, we expect you to act with honesty and integrity, taking into account that our purchasing practices require Landcom to achieve value for money and ensure that public money is spent appropriately.

## Modern Slavery Act 2018

Landcom expects all of its Suppliers to act in accordance with the *Modern Slavery Act 2018* (Cth) and avoid any activity which results in modern slavery. Landcom may ask its Suppliers to complete a Modern Slavery Assessment as part of their contractual obligations.

## Hold each other accountable to the Code of Conduct

Any violation of the Code not only erodes the trust we have built within government and the community, it also puts Staff and business at risk. It undermines productive working relationships and prevents Landcom from doing its best work. For this reason, every person who is engaged to undertake works for or on behalf of Landcom is obligated to raise concerns promptly.

Landcom is committed to protecting any person who raises concerns about a breach of the Code from retaliation or reprisals. Any attempt to take detrimental action against a person who raises a legitimate breach of the Code will be treated seriously and may lead to the termination of your engagement with Landcom. It may also involve referral to the NSW Ombudsman, the NSW Independent Commission Against Corruption or the NSW Police.

## Addressing suspected violations

If you become aware of a potential or suspected violation of the Code, you must promptly raise the matter with your Landcom Representative.

## Reporting breaches of the Code

If you see anyone act in a way that is contrary to the Code, you must report the incident immediately by contacting:

- Your Landcom Representative, who may also direct you to Landcom's EGM Legal & Compliance, Landcom's Fraud Control and Corruption Prevention Coordinator (whom you can reach by email on [fraudcontrol@landcom.nsw.gov.au](mailto:fraudcontrol@landcom.nsw.gov.au)) or a member of the Landcom Legal team; or
- Landcom's CEO or the Board of Landcom.

If the breach is by your Landcom Representative, then you may report the incident to Landcom's Fraud Control and Corruption Prevention Coordinator whom you can reach by email on [fraudcontrol@landcom.nsw.gov.au](mailto:fraudcontrol@landcom.nsw.gov.au). The Fraud Control and Corruption Prevention Coordinator may direct you to Landcom's EGM Legal & Compliance, a member of ExCo or the CEO.

If you have reported a breach of the Code and feel the report has not been adequately addressed or resolved, you are encouraged to bring the concern to the attention of the CEO or the Board of Landcom directly, who will carefully consider the report and take appropriate action.

Landcom is committed to protecting any person who reports or participates in an investigation of a possible violation of the Code, Policies or the law against retaliation. If you believe you are

being retaliated against, please contact your Landcom Representative or the Landcom Fraud Control and Corruption Prevention Coordinator at [fraudcontrol@landcom.nsw.gov.au](mailto:fraudcontrol@landcom.nsw.gov.au).

### **Reporting bankruptcy, serious criminal offences and other non-compliance matters**

If you or your company becomes bankrupt or are charged, convicted or found guilty of a serious indictable offence or any offence that may impact your ability to undertake part or all of the inherent requirements of your engagement with Landcom, you must immediately notify your Landcom Representative.

Your engagement with Landcom may be suspended or terminated until the bankruptcy proceeding is resolved or there is an outcome in respect to the offence.

If you or your company becomes aware that you are, or will soon be unable to meet the contractual obligations, you must advise your Landcom representative in advance of any administration, restructure, bankruptcy or other material default where possible.

If you or your company becomes aware of any serious IT breach including data theft, loss, security breaches or any other matter which impacts Landcom, you must notify Landcom as soon as possible of:

- The nature of the breach;
- Whether any Landcom material or data has been impacted in any way;
- Whether the delivery of the contracted goods or services is at risk; and
- What remediation plans are in place and for how long.

### **Reporting suspected wrongdoing**

Landcom does not tolerate any act of fraud or corruption and immediate action will be taken whenever fraudulent or corrupt behaviour is detected, reported or suspected. Always report any behaviour that you observe, consider or suspect may be unethical, fraudulent or corrupt to your Landcom Representative in the first instance. They will provide guidance and assistance, including when and how to make a report and how the report will be escalated.

Please also be aware of the PID Act, which will provide protection against reprisal to you if you make a report that you honestly believe, on reasonable grounds, shows, or tends to show one of the following categories of behaviour:

- Corruption;
- Maladministration;
- Serious and substantial waste of public money;
- A GIPA Act contravention; or
- Local government pecuniary interest contravention.

Your Landcom Representative or Landcom Fraud Control and Corruption Prevention Coordinator can provide a copy of Landcom's PID and Internal Reporting Policy and Procedure which is also available on the Landcom website. They can also provide advice as to how to make a public interest disclosure in such a way as to obtain the protections against reprisal offered by the PID Act, if requested.

### **What happens if you breach the Code?**

Landcom will address alleged breaches of the Code promptly, in a fair and reasonable manner.

Actions to deal with any alleged breaches will be based on:

- Whether the breach was deliberate;
- The seriousness of the breach;
- The likelihood of the breach occurring again;
- Whether the organisation or person has committed the breach more than once;
- The risk the breach poses to Staff, stakeholders, and any other persons; and
- Whether the breach would be serious enough to warrant action for breach of contract.

If you breach the Code, the matter may be reported to an external organisation such as relevant registration boards, the NSW Police or other government agencies such as the NSW Independent Commission Against Corruption. In addition to any action taken by Landcom, referral to external agencies may result in criminal proceedings against you if there is sufficient evidence.

Once an alleged breach is reported, your engagement with Landcom may be suspended until an allegation of misconduct or criminal charge or investigation of corrupt conduct has been dealt with. Depending on the outcomes of the investigation, your engagement with Landcom may be terminated.

If you have reported a breach of the Code and feel the report has not been adequately addressed or resolved, you are encouraged to bring the concern directly to the attention of the CEO who will carefully consider the report and take appropriate action.

## Document Control Table

| Document information      |                               |
|---------------------------|-------------------------------|
| Document approver         | Chief Executive Officer       |
| Document owner name       | EGM, People, Culture & Safety |
| Document delegate name/s  | Director, People & Culture    |
| Document version number   | 2.0                           |
| Document version date     | December 2021                 |
| Document review cycle     | Every 2 years                 |
| Next document review date | 1 November 2023               |
| Document location         | External and Internal         |
| Document level            | 2 = CEO approved document     |

| Linked artefacts   |   |
|--------------------|---|
| Linked documents   | <ul style="list-style-type: none"> <li>Landcom Staff Code of Conduct</li> <li>Landcom Fraud Control Framework &amp; Fraud Control and Corruption Prevention Policy</li> </ul>   |
| Linked legislation | <ul style="list-style-type: none"> <li>Government Information (Public Access) Act 2009</li> <li>Health Records and Information Privacy Act 2002</li> <li>Independent Commission Against Corruption Act 1988</li> <li>Landcom Corporation Act 2001</li> <li>Public Interest Disclosures Act 1994</li> <li>Public Finance and Audit Act 1983</li> <li>Privacy and Personal Information Protection Act 1998</li> <li>Ombudsman's Act 1974</li> <li>State Owned Corporations Act 1989</li> <li>State Records Act 1998</li> <li>Work Health &amp; Safety Act 2011</li> </ul> |
| Linked risks       | <ul style="list-style-type: none"> <li>Commercial</li> <li>Regulatory</li> <li>Reputational</li> <li>Technology</li> <li>People &amp; Culture</li> <li>Stakeholder &amp; Community</li> </ul>   |

| Revision history |               |                            |   |
|------------------|---------------|----------------------------|---|
| Version          | Approval date | Author                     | Description   |
| 1.0              | 27/11/2019    | Landcom                    | Developed Supplier Code of Conduct  |
| 2.0              | 8/12/2021     | Director, People & Culture | Complete review. Updated to new corporate document guidelines and insertion of Modern Slavery Act provisions. |