



June 2021

MinterEllison

**Procurement Compliance
Standards**

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MinterEllison



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Standards

MinterEllison provides an extensive range of legal and consulting services to a wide range of clients where our purpose is to create lasting impacts with our clients, our people and our communities. We seek excellence in all aspects of our business and are committed to the highest standards of professionalism, ethics and integrity.

Specifically our distinctive values are:

1. We build authentic and enduring relationships
2. We deliver excellence without attitude
3. We are curious and innovative
4. We make diversity in all its forms central to collaboration
5. We support sustainable ways of working

This includes a commitment to work with suppliers to ensure a high level of compliance consistent with these Procurement Compliance Standards (**Standards**). We expect our suppliers to share our commitment and to have their own internal policies and procedures to support these Standards.

These Standards will survive the terms of any contractual arrangement made between any MinterEllison entity and the relevant supplier, where they are incorporated into the terms.

1. Ethical business practice

- (a) MinterEllison is committed to conducting its business activities with integrity. We expect our suppliers to conduct themselves in an ethical and fair manner, free from bias, unfair advantage, or any other behaviour which may cause MinterEllison financial loss or damage to reputation.
- (b) Suppliers must not engage in fraud, bribery or corrupt conduct and must comply with all applicable anti-bribery and anti-corruption laws.
- (c) We expect suppliers to avoid conflict of interest in the provision of goods or services to MinterEllison. If you have a conflict in the provision of goods or services to us because of an outside interest or relationship, we expect you to disclose that to us.
- (d) Suppliers must not offer any partner or employee of MinterEllison any gift or hospitality which is of such value that it may have the effect of improperly influencing their decision.

2. Competition

- (a) MinterEllison reserves the right to take action if it becomes aware of suppliers engaging in collusion with another person such as exchange of information, fixing of price or conditions of contract. Suppliers must not share information with us which might result in an anti-competitive effect or object, and cause non-compliance with applicable competition laws.

3. Reciprocity

- (a) MinterEllison will always procure goods and services consistent with these Standards and not seek to make purchasing decisions on any form of reciprocity commitment with or from our client. We must leave our clients free to procure goods and services unconstrained by any reciprocity considerations.



4. Protect Confidentiality and respect privacy

- (a) MinterEllison treats the confidential information of our clients, partners, consultants and employees with the highest respect and in compliance with relevant laws. As a law firm we have professional obligations of confidentiality and it is essential that our suppliers are aware of our obligations and comply with their duty of confidentiality in accordance with contractual agreements.
- (b) Our suppliers are expected to keep all information received about any MinterEllison entity, its clients or its employees confidential. We expect our suppliers to put in place appropriate safety measures to ensure access to confidential information is restricted. We may require suppliers to enter into a non-disclosure agreement in advance of being provided with confidential information.
- (c) We expect our suppliers to handle all information in accordance with applicable legal and regulatory requirements.
- (d) Suppliers must comply with all applicable privacy laws.

5. Information security

- (a) MinterEllison is committed to maintaining the highest standard of information security when it comes to information regarding our clients, client matters, our employees, and our own information.
- (b) If required by us, where a supplier holds information regarding our clients, client matters, our employees and our own information, the supplier is required to make available for our review their own internal information security policy. If we have any concerns about the suitability of the security measures, we may require our suppliers to comply with our policy. This outlines the behaviours and security measures required in protecting the information of our clients, our employees and MinterEllison.
- (c) Our suppliers are expected to put in place applicable technical and organisational measures to protect information they receive about any MinterEllison entity, our clients or our employees.

6. Diversity & Inclusion

- (a) MinterEllison has a strong commitment to equal opportunity, diversity and inclusion. We seek to extend this commitment through our supply chain to ensure, where it is practical to do so, that our purchasing decisions reflect our distinctive values.
- (b) Where appropriate, we will seek expressions of interest from suppliers whose businesses can achieve positive social outcomes including:
 - (i) a commitment to promoting and improving gender equality including increased economic opportunities for women;
 - (ii) a commitment to Reconciliation and providing increased economic opportunity for Indigenous Australians;
 - (iii) providing a safe workplace for all, free from harassment, discrimination and bullying;
 - (iv) fostering a safe and inclusive workplace environment for the LGBTQ+ population;
 - (v) fostering a safe and inclusive environment for effective disability inclusion;
 - (vi) the expansion of social enterprise in Australia and beyond;
 - (vii) fair trade; and
 - (viii) local procurement in each of our locations.

- (c) Our suppliers are expected, where relevant, to be compliant with the Workplace Gender Equality Act (*Cth*) 2012.

7. Modern slavery

- (a) Suppliers are required to give regard to our Modern Slavery Statement published on our website: www.minterellison.com in the course of their dealings with MinterEllison.
- (b) We expect our suppliers to adopt and demonstrate the following standards of compliance and ensure that they also apply within their supply chain:
 - (i) Forced or unpaid labour and human trafficking – there should be no forced, unpaid or involuntary labour. All labour must be voluntary. Workers will be free to leave their employment after their legal standard working hours (subject to reasonable and legally allowed paid notice periods). Employees will not be subject to any coercion or restriction through for example, the holding of copies of employee passports, identity documents or monetary deposits. All employees must also be compensated fairly for their work and must not involve any work undertaken to repay a debt for example, as a result of deceptive recruiting practices;
 - (ii) Child labour – there will be no use of child labour and there must not be employment of children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age. Workers under the age of 18 must only perform work in accordance with legal requirements (eg with regards to working time, wages and working conditions) and subject to any requirement regarding education or training.;
 - (iii) Wages – the legal minimum wage standard must be adhered to across the entire workforce and employees should be provided with clear information on their wages and conditions. Excessive or unfair deductions from their wages are not permitted as a disciplinary measure;
 - (iv) Health and safety – all employees should work in an environment that is safe and hygienic. Steps must be taken to ensure employees are if applicable, provided with adequate accommodation/equipment and safe conditions to perform their work;
 - (v) Employment terms – all employees should be provided with written contracts detailing the terms and conditions in accordance with the local relevant legal jurisdiction.

8. Sustainability

- (a) MinterEllison recognises that a commitment to sustainability goes beyond environmental sustainability and must balance social sustainability and supporting businesses that will deliver positive outcomes more broadly, as detailed in the MinterEllison Sustainability Policy.¹
- (b) If requested by MinterEllison, suppliers will provide evidence of their commitments to environmental sustainability including a written environmental policy. Where a supplier does not have an environmental policy commensurate with MinterEllison's commitments, the supplier agrees to work collaboratively with MinterEllison to increase their ambitions and develop and implement such a policy. We may review the supply arrangement if lack of progress is made at the end of an agreed period.

¹ MinterEllison Sustainability policy 2016 and strategy are currently under review, further to the firm's 2020 sustainability framework. Key commitments will be replicated in this document once finalised.



9. Regulatory compliance

- (a) As a legal and consulting firm our practice and conduct are regulated in every jurisdiction in which we operate. We expect our suppliers to recognise that we are subject to legal profession and broader business regulatory obligations, the nature and extent of which may differ from one jurisdiction to another and these regulations may affect our dealings with suppliers.
- (b) Where our suppliers have access to our confidential information, we expect our suppliers will allow audits to be carried out as required by the relevant professional regulators and to provide every assistance reasonably requested by them and/or us in this respect.

10. Tax evasion

- (a) MinterEllison adheres to all relevant tax laws and it is our expectation that our suppliers do the same. We expect our suppliers to implement suitable procedures, systems and controls applicable to their business in order to prevent tax evasion.
- (b) We do not tolerate deliberate and dishonest participation in tax evasion or avoidance – or any financial crime. We expect supplier to report to the relevant authorities where they become aware of such practice, including conduct of their representatives.

11. Workplace health & safety

- (a) Our suppliers are to be fully aware of and abide by their responsibilities under applicable workplace health and safety legislation, regulations and standards. All suppliers must have policies, practices and systems that ensure compliance with all work health & safety responsibilities.