



**DB Controls**  
& HVAC Services

# Our Code of Conduct

**DB Controls & HVAC Services**

# Table of Contents

|  |    |
|--|----|
| 1.1 Company Guiding Principles .....                 | 3  |
| 1.2 What We Do.....                                  | 4  |
| 1.3 Why we have a Code of Conduct .....              | 4  |
| 1.4 Business integrity .....                         | 5  |
| 1.4.1 Confidentiality.....                           | 5  |
| 1.4.2 Requirements.....                              | 5  |
| 1.5 Corporate Governance.....                        | 6  |
| 1.6 Human rights and fundamental rights at work..... | 6  |
| 1.6.1 Requirements.....                              | 6  |
| 1.6.2 Working Towards .....                          | 7  |
| 1.7 Health & Safety .....                            | 7  |
| 1.7.1 Requirements.....                              | 7  |
| 1.7.1 Working Towards .....                          | 7  |
| 1.8 Environment.....                                 | 8  |
| 1.8.1 Requirements.....                              | 8  |
| 1.8.2 Working Towards .....                          | 8  |
| 1.9 Inclusive supply chain .....                     | 8  |
| 1.9.1 Requirements.....                              | 8  |
| 1.9.2 Working Towards .....                          | 9  |
| 2.1 Reporting.....                                   | 9  |
| 2.1.1 Requirements.....                              | 9  |
| 2.1.2 Working Towards .....                          | 10 |

## 1.1 Company Guiding Principles

### **Sustainability**

**Taking responsibility for energy reduction.**

### **Innovation**

**Embracing the latest technology.**

### **Exceed expectations**

**Constantly strive to be the leaders in our field.**

### **Professionalism**

**Always work to the highest professional standards.**

## 1.2 What We Do

DB Controls & HVAC Services Pty Ltd (DB Controls & HVAC Services) is a Control System Integration company specialising in remote monitor diagnostic service and maintenance control platforms, BMS, PLC & energy management control systems.

Our guiding principles and Code of Conduct create a framework used to ensure that employees and business partners understand and meet the minimum level requirements expected when working with DB Controls & HVAC Services.



**David Byrne**

Managing Director

## 1.3 Why we have a Code of Conduct

In alignment with our mission and as part of our ongoing sustainability efforts we have developed the following Code of Conduct to ensure that all our business partners, suppliers, and manufacturers meet our basic expectations of doing business related to legal requirements, ethical practices, human rights, and environmental management. Compliance with these standards is an expectation of doing business with DB Control & HVAC Services as the Code defines the non-negotiable minimum standards that we ask our suppliers and their sub-tier suppliers or sub-contractors (the Supplier), to respect and adhere to.

DB Controls & HVAC Services seeks to develop and strengthen partnerships based on a shared commitment of transparency, collaboration, and mutual respect. We recognise that our suppliers are independent businesses and the exclusive employers of their workers. However, the actions of our business partners can be attributed to DB Controls & HVAC Services, affecting not only our reputation, but the level of trust we have worked hard to earn from partners and customers. While DB Controls & HVAC Services appreciates that our suppliers operate in a variety of different legal, geographical, and cultural environments we expect all Suppliers to comply with the Code, and hope that our Suppliers will strive to exceed these standards.

The standards of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier and DB Controls & HVAC Services.

## 1.4 Business integrity

DB Controls & HVAC Services is committed to the highest standards of business high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing, and operations.

Suppliers are expected to comply with all antibribery, anti-corruption, anti-money laundering, and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

### 1.4.1 Confidentiality

Suppliers must not improperly use any private, confidential, or commercially sensitive information in its possession relating to or in connection with its dealings with the State.

### 1.4.2 Requirements

- A) **Compliance with Law:** Suppliers' business activities shall comply with all applicable laws and regulations in the countries and jurisdictions in which they operate. This Code applies to activities in the locations where suppliers' goods are produced, where any related services are performed, and where the goods enter the supply chain.
- B) **Bribery:** There is a prohibition of all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by the supplier.
- C) **Conflicts of Interest:** Suppliers will disclose to DB Controls & HVAC Services any situation that may appear to be a conflict of interest and disclose if a worker from one of their family members, or a friend may have an interest of any kind in Supplier's business or any kind of economic ties with Supplier.
- D) **Professional Conduct:** Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring DB Controls & HVAC Services into disrepute.
- E) **Freedom of Association:** Suppliers shall respect the rights of workers to associate or not to associate with any group, as permitted by and in accordance with all applicable laws and regulations.
- F) **Records:** Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies, and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.
- G) **Intellectual Property:** Supplier respects the intellectual property rights of others. Supplier takes appropriate steps to safeguard and maintain confidential and proprietary information or trade secrets of DB Controls & HVAC Services and uses such information only for the purposes authorised for use by DB Controls & HVAC Services

## 1.5 Corporate Governance

DB Controls & HVAC Services is committed to sound management administration, risk, and corrective action systems, are key to a reliable supply chain for DB Controls & HVAC Services. Suppliers are expected to maintain sound administration processes.

- A) **Risk Assessment and Management:** Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.
- B) **Critical incident management:** Suppliers should
  - I. identify and assess potential critical incident, emergency situations and business continuity risks; and
  - II. Develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.
- C) **Audits and assessments:** To ensure compliance with this Code and the applicable laws, Suppliers are expected to:
  - III. Perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
  - IV. Cooperate openly and honestly with any State audit, assessment, or review.

## 1.6 Human rights and fundamental rights at work

DB Controls & HVAC Services expects our suppliers to conduct their activities in a manner that respects human rights.

### 1.6.1 Requirements

- A) **Voluntary Labour:** Supplier employs all workers on a voluntary basis free from any threat of violence, threats of criminal penalty, and restrictions on freedom of movement. Supplier shall not use any prison, slave, bonded, forced, indentured, or debt induced labour, or engage in any other forms of compulsory labour, or any other forms of slavery or human trafficking.
- B) **Minimum Age:** Under no circumstances will supplier employ workers under the age of 15 or under the minimum age for work or mandatory schooling as specified by the local law, whichever is higher. When young workers are employed, they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school. In the case of hazardous work, the minimum age is 18.
- C) **Employment Practices:** The supplier shall only employ workers who are legally authorised to work in their facilities and are responsible for validating workers' eligibility to work through appropriate documentation. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice

## 1.6.2 Working Towards

- A) **Worker Documentation:** Supplier does not require workers to deposit original identification documents, travel documents or any other personal legal documents upon commencing employment with Supplier.
- B) **Migrant Labour:** Supplier recognizes the unique legal, social, and cultural situations that migrant workers face and will ensure that such workers are treated with dignity, respect, and in accordance with the same standards as apply to other workers.
- C) **Privacy:** The Supplier shall respect the privacy rights of its workers whenever it gathers private information or implements worker monitoring practices.
- D) **Recruitment & Security:** Supplier shall ensure that if third-party recruitment agencies are used they are compliant with the provisions of this Code and the law. Suppliers recruiting foreign contract workers either directly or through third party agencies shall be responsible for payment of all recruitment-related fees and expenses. When the Supplier retains direct or contracted workers to provide security to safeguard its personnel and property, the Supplier will make sure that security personnel apply the standards in this code.

## 1.7 Health & Safety

DB Controls & HVAC Services expects the Suppliers operations, facilities, and procedures to protect and promote worker health and safety.

### 1.7.1 Requirements

- A) **Workplace Environment:** The Supplier shall provide its workers with a safe and healthy working environment. At a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation facilities, and personal protective equipment must be provided together with equipped workstations at no cost. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.
- B) **Hazardous Materials & Product Safety:** The Supplier shall identify hazardous materials, chemicals, and substances, and ensure their safe handling, movement, storage, recycling, reuse, and disposal. Supplier shall comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key workers are aware of and trained in product safety practices.
- C) **First Aid:** Supplier shall establish and maintain appropriate first aid equipment at the facility and always make it available to workers. The location of the equipment shall be prominently marked and communicated to workers. Supplier maintains records of health and safety training and accidents and injuries at the workplace.

### 1.7.1 Working Towards

- A) **Emergency Preparedness:** The Supplier shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, and adequate exit facilities. The Supplier shall regularly train workers on emergency planning, responsiveness as well as medical care.

- B) **Housing Conditions:** If Supplier provides housing it must be voluntary or complementary, and dormitory facilities shall be constructed and maintained in accordance with all applicable laws and regulations, and they shall be clearly segregated from the factory and production area. All dormitory buildings shall be clean and safe and workers shall be able to enter and leave the dormitory buildings freely at any hour. There shall be clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. All dormitory facilities shall also provide workers with reasonable personal space, adequate heat and ventilation and clean shower and bathrooms.

## 1.8 Environment

DB Controls & HVAC Services requires its Suppliers to comply with all applicable legal environmental requirements and demonstrate continual improvement of its environmental performance.

### 1.8.1 Requirements

- A) **Environmental Permits & Reporting** the Supplier shall make sure that it obtains, keeps current, and follows the reporting guidelines of all the required environmental permits and registrations to be at any time legally compliant.
- B) **Resource Consumption, Pollution Prevention & Waste Minimization**  
The Supplier shall optimize its consumption of natural resources, including energy and water. Supplier shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater, and air emissions. Prior to discharge or disposal, supplier shall characterise and treat wastewater and solid waste appropriately and according to applicable laws.

### 1.8.2 Working Towards

- A) **Measurement & Monitoring:** Supplier shall continuously monitor and disclose to DB Controls & HVAC Services their energy and natural resource usage, emissions, discharges, carbon footprint and disposal of wastes and take a progressive approach to minimise negative impacts on the environment.
- B) **Training:** Training is provided to all personnel on environmental policies and procedures to ensure effective implementation and compliance.

## 1.9 Inclusive supply chain

DB Controls & HVAC Services believes all workers deserve an equal chance to succeed based on their hard work, talent, and commitment, and should always be treated with fairness and respect.

### 1.9.1 Requirements

- A) **Discrimination & Harassment:** All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological, verbal harassment, abuse, or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement. Discrimination based on caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, disability, or pregnancy is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.
- B) **Grievance Mechanism:** The Supplier shall provide all workers with transparent, fair, accessible and confidential procedures that result in swift, unbiased, and fair resolution of difficulties which may arise as part of their working relationship. Workers will be protected from retaliation for submitting such complaints.

## 1.9.2 Working Towards

- A) **Diversity:** DB Controls & HVAC Services expects its Suppliers to demonstrate a diverse workforce composition actively embracing workforce age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability and promoting supply chain inclusion throughout their own supply chains.
- B) **Transportation:** Supplier shall work collaboratively with workers to ensure their adequate access to necessary services. Any transportation provided by the Supplier or agent on Supplier's behalf must be safe and in compliance with legal requirements. Should the Supplier relocate the worker from the original point of hiring, the Supplier shall provide return passage to the origination location at no charge to the worker.
- C) **Discrimination & Harassment (expanded):** Supplier does not conduct medical tests on workers that can be used to discriminate (e.g. pregnancy testing). The results of any tests that are required by local legislation shall not be used in a discriminatory way. The supplier shall not use any form of home working arrangement for the production of any DB Controls & HVAC Services branded or affiliate product.
- D) **Community:** Supplier will ensure due diligence is undertaken to uphold individual, community or indigenous people's established rights to property and land.

## 2.1 Reporting

**COMMUNICATION AND REPORTING:** Suppliers shall take appropriate steps to ensure the principles of this Code are communicated to their workers. Suppliers shall also take appropriate steps to ensure the principles of this Code are adopted and applied by their workers, suppliers, agents, and contractors

### 2.1.1 Requirements

- A) **Books & Records:** Suppliers shall maintain accurate and transparent books, records, and accounts to demonstrate compliance with applicable laws and regulations and this Code.
- B) **Audits & Assessments:** DB Controls & HVAC Services reserves the right to audit compliance with this Code. Audits are facility inspections that include worker interviews and a review of supplier records and business practices. Such audits are conducted by DB Controls & HVAC Services or its appointed partner. If an audit identifies a violation of this Code, suppliers shall act promptly to correct the situation to DB Controls & HVAC Services satisfaction, with a corrective action plan.

- C) **Reporting:** Suppliers are responsible for prompt reporting of actual or suspected violations of law, this Code, and any contractual relationship with DB Controls & HVAC Services. This includes violations by any worker or agent acting on behalf of either the supplier or DB Controls & HVAC Services. You may report a violation via e-mail using the following address [david@dbcontrolservices.com.au](mailto:david@dbcontrolservices.com.au) or by phone at 0401 627 271.

## 2.1.2 Working Towards

- A) **Origin:** The supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with goods and services. DB Controls & HVAC Services reserves the right to ask the supplier to create, at a point of time, full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance.
- B) **Communicating & Training:** Suppliers must inform workers about the expectations contained in this Code. This includes prominently posting the Code in the workplace in an area accessible to workers, conducting group or individual meetings to review and explain the Code, distributing explanatory pamphlets to workers, or communicating through on-line channels.