

# UN GLOBAL COMPACT COMMUNICATION ON PROGRESS

PERIOD OF COMMUNICATION:  
MARCH 2021 – JUNE 2022

*Davenport Campbell*

# LETTER OF COMMITMENT

Davenport Campbell & Partners Pty Ltd (Davenport Campbell) is an Interior Architectural Services business with studios in Sydney, Melbourne and Canberra.

We are pleased to reaffirm our continued support for the UN Global Compact and our ongoing commitment to corporate sustainability through embracing the Ten Principles in each of the four issue areas of Human Rights, Labour, the Environment and Anti-Corruption, plus contribute to delivering the Sustainable Development Goals through our commitment to responsible business practices.

In this Communication of Progress we set out the initiatives in place within our business and the actions we are undertaking to constantly challenge and improve our response to the Global Compact and its integration into our company culture and business relationships and how we operate in society.

We commit to share this information with our peers and to influence other companies and individuals to align their practices to a sustainable and inclusive future.

Yours sincerely,

A handwritten signature in white ink, appearing to read 'Neill Johanson', with a stylized flourish at the end.

Neill Johanson  
Co-Principal  
Davenport Campbell & Partners

# GLOBAL COMPACT OVERVIEW

## EXTRACT FROM UN GLOBAL COMPACT STRATEGY 2021-2023

Twenty years ago, in July 2000, United Nations Secretary-General Kofi Annan put forth the vision of "a global compact of shared values and principles, which will give a human face to the global market." Since then, UN Global Compact has grown from a group of 44 businesses into what it is today, the world's largest corporate sustainability initiative and a global movement of more than 12,000 businesses and 3,000 non-business stakeholders across more than 160 countries.

Over two decades, UN Global Compact has mobilized companies around the world to align their operations and strategies around Ten Principles in the areas of Human Rights, Labour, the Environment and Anti-Corruption and enabled them to report on their progress in living up to these principles.

With the broad-based support of all 193 participant countries of the United Nations General Assembly, UN Global Compact remains the single, global normative authority and reference point for action and leadership within a growing global corporate sustainability movement.

Corporate sustainability starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of Human Rights, Labour, Environment and Anti-Corruption.

Responsible businesses embody the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another. By incorporating the Ten Principles of the UN Global Compact into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success.

The establishment in 2015 of the Sustainable Development Goals (SDGs) has created a global consensus on the development framework for a better world. Engagement of the business community in this agenda is critical. Achieving the Global Goals and the goals of the Paris Agreement requires the business community from the large multinational corporations to the small and medium-sized enterprises to purposefully embed the Ten Principles in their operations. UN Global Compact is leading this movement by driving the ambition and laying out the roadmap for businesses to do their part in this global effort.

Raising this ambition among businesses and accelerating progress begins with adopting the Ten Principles as the DNA of business action and contribution. The Ten Principles are the "How." The SDGs are the "What."

COVID-19 and its economic aftershocks only amplify the very real and urgent need for collective action to address structural inequalities, poverty, the climate crisis, and gaps in social protection, especially for women and youth. There is a clear demand from the public, civil society, and governments for business to contribute to a transformative recovery from COVID-19. Indeed, the adoption of the Ten Principles and advancement of responsible business practices is essential for businesses to effectively recover from the COVID-19 pandemic while creating long-term corporate competitive advantage and contributing to the goals of the Paris Agreement. Only through collective action can society build back better from the global pandemic and become more resilient on a trajectory to achieve the SDGs.

In this 20th anniversary year of the Global Compact, we must uphold the Ten Principles and rise to Kofi Annan's challenge to devise a "compact on the global scale, to underpin the new global economy."

## THE ROLE OF THE GLOBAL COMPACT AND THE PURPOSE OF THIS DOCUMENT

# GLOBAL COMPACT OVERVIEW

UN Global Compact works with all companies, be they global or local, large or small, in the Global North or the Global South, all with a view to advancing the responsible business agenda.

Davenport Campbell joined the UN Global Compact 12 months ago because we understood the need to accelerate and scale the global collective impact by business to commit to a sustainable and inclusive future.

Over the preceding 12 months, we have undertaken a review of our policies and business strategies to ensure they align with the Ten Principles of the UN Global Compact and remain committed to embedding the Ten Principles into our business 'DNA'.

We are empowered by the need to be a responsible, accountable business and are invigorated by the actions outlined in the UN Global Compact Strategy 2021-2023 document.

As part of our fundamental responsibilities we are reporting our 'Communication on Progress' (COP) in this document.

We have addressed the Ten principles in each of the areas of Human Rights, Labour, the Environment and Anti-Corruption in the following pages to communicate what our policies and strategies are now, with our future goals and ambitious targets stated.

Each Principle is listed within the area that it relates to within Human Rights, Labour, the Environment and Anti-Corruption, with Davenport Campbell's response.

In each of these 4 areas, we have also outlined the SDGs we commit our contribution to.

# GLOBAL COMPACT OVERVIEW

## BACKGROUND OF THE OVER-ARCHING OBJECTIVES AND THE ROLE OF THE SDG'S

**In the 20th Anniversary Progress Report, the UN Global Compact understood there is significant cause for concern about the future of our society and planet.**

Current trajectories suggest that the world is not on track to achieve the SDGs set out in the 2030 Agenda for Sustainable Development and the Paris Agreement on Climate Change, adopted by all United Nations Member States in 2015.

With only 10 years left to shift the world onto a 1.5°C trajectory to reduce global inequalities and achieve the substance of the SDG agenda, current UN Secretary-General António Guterres has galvanized the world for a Decade of Action - an ambitious global effort to deliver the promise of the 2030 Agenda.

In this Decade of Action, there is an urgent need for the business community to raise its ambition and use its resources, scale, and speed, to meaningfully contribute to delivering the SDGs.

The over-arching goal of the Global Compact's Strategic Plan 2021-2023 is to scale up the global business community's contributions to the 2030 Agenda for Sustainable Development and the implementation of the Paris Agreement on Climate Change.

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

### HUMAN RIGHTS

**PRINCIPLE 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**PRINCIPLE 2:** make sure that they are not complicit in human rights abuses.

### LABOUR

**PRINCIPLE 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**PRINCIPLE 4:** the elimination of all forms of forced and compulsory labour;

**PRINCIPLE 5:** the effective abolition of child labour; and

**PRINCIPLE 6:** the elimination of discrimination in respect of employment and occupation.

### ENVIRONMENT

**PRINCIPLE 7:** Businesses should support a precautionary approach to environmental challenges;

**PRINCIPLE 8:** undertake initiatives to promote greater environmental responsibility; and

**PRINCIPLE 9:** encourage the development and diffusion of environmentally friendly technologies.

### ANTI-CORRUPTION

**PRINCIPLE 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

While the Ten Principles are timeless and define how an organisation interacts with society, customers, employees, suppliers and the environment, the SDGs are a timebound framework for what we seek to achieve.

The UN Global Compact has filtered the 17 SDGs into three engagement categories, those in which we can lead and shape, those in which we can seek to cooperate with others and those we seek to amplify.

### LEAD AND SHAPE

- **SDG 5:** Gender Equality
- **SDG 8:** Decent Work and Economic Growth
- **SDG 13:** Climate Action
- **SDG 16:** Peace, Justice and Strong Institutions
- **SDG 17:** Partnerships for the Goals

### COOPERATE WITH OTHERS

- **SDG 6:** Clean Water and Sanitation
- **SDG 7:** Affordable and Clean Energy
- **SDG 9:** Industry, Innovation and Infrastructure
- **SDG 10:** Reduced Inequalities
- **SDG 12:** Responsible Consumption and Production
- **SDG 14:** Life Below Water

### FOLLOW AND AMPLIFY

- **SDG 1:** No Poverty
- **SDG 2:** End Hunger
- **SDG 3:** Good Health and Well-Being
- **SDG 4:** Quality Education
- **SDG 11:** Sustainable Cities and Communities
- **SDG 15:** Life on Land

In the following pages, our Communication on Progress outlines the Ten Principles within the categories of Human Rights, Labour, the Environment and Anti-Corruption and we have outlined the SDGs that we see relate to each of the areas, within Davenport Campbell's current progress.

# LINKS TO FURTHER INFORMATION

[WWW.UNGLOBALCOMPACT.ORG](http://WWW.UNGLOBALCOMPACT.ORG)

[WWW.UNGLOBALCOMPACT.ORG/WHAT-IS-GC/MISSION/PRINCIPLES](http://WWW.UNGLOBALCOMPACT.ORG/WHAT-IS-GC/MISSION/PRINCIPLES)

[WWW.UNGLOBALCOMPACT.ORG/SDGS/17-GLOBAL-GOALS](http://WWW.UNGLOBALCOMPACT.ORG/SDGS/17-GLOBAL-GOALS)





# HUMAN RIGHTS

## This section sets out the UN Global Compact conventions on Principles 1 & 2 relating to Human Rights and Davenport Campbell's COP.

Davenport Campbell values and respects all human rights and is committed to ensuring that all our business, both locally and internationally, is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business.

We conduct our business and all our relationships based on dignity, equality, mutual respect and integrity and we abide by a code of conduct that ensures human rights are recognised in all our relationships regardless of race, gender, culture and ethnicity, religion, age, sexual preference or physical ability.

We commit to provide training and development for our employees to recognise and act on anything they deem to be unfair treatment and to live our lives based on being treated fairly, treating others fairly and having the ability to make genuine choices in our daily lives.

Respecting each other and each other's human rights is the foundation of our business in where everyone can make a contribution and feel included.

We care about the way our suppliers do business, and we will work with them to continuously improve to the expectations outlined in our Supplier Code of Conduct.

This Code of Conduct outlines our expectations in the areas of labour and human rights, as well as health and safety, environment, ethical dealings and supply chain diversity.

We are committed to investigating our corporate business relationships to ensure their integrity and that we remain non-complicit in any human rights abuses throughout our supply chains.

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We are committed to investigating our corporate business relationships to ensure their integrity and that we remain non-complicit in any human rights abuses throughout our supply chains.

### HUMAN RIGHTS POLICY

As part of our corporate responsibilities, we maintain a documented Human Rights Policy which strives to go beyond legal compliance in respecting and supporting the human rights of all stakeholders, within and external to our business.

This provides our company principles in compliance with the Australian Human Rights Commission Act 1986, along with the Universal Declaration of Human Rights and the International Covenant on Economic, Social and Cultural Rights.

1. **BUSINESSES SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS**

2. **MAKE SURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES**

# HUMAN RIGHTS

1. **BUSINESSES SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS**

2. **MAKE SURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES**

## FUTURE GOALS

Create assessment tools for our Supply Chain to ensure that our level of tolerance can be measured and improved within the next 12 months, exercising influence on subcontractors, suppliers and other business affiliates to combat modern slavery and child labour and are not complicit in any human rights abuses. suppliers and other business affiliates to combat modern slavery and child labour and are not complicit in any human rights abuses.

## MEASUREMENT OF OUTCOMES

By adhering to our policies and strategies, Davenport Campbell has maintained a good working culture for our employees. We have had no reports or investigations, legal cases, rulings, fines or other events related to any breaches to Human Rights in the past 12 months.

We are promoted through recruitment agencies as an employer of choice and maintain a constant motivated, healthy and gender equal workforce.

Employees have recently undertaken performance appraisals and were given the opportunity for feedback. We recorded a high degree of positive comment on Davenport Campbell's management and respect for individuals and adherence to good business principals in relation to compliance, and development of our employees.

In the past 12 months, we have run in-house training and development workshops for our employees on subjects relating to their career development, plus weekly Team Meetings that provide an update on policies and training in specific areas relative to our business goals.

## TARGETED SDGS





# LABOUR

This section sets out the UN Global Compact conventions on Principles 3, 4, 5 & 6 relating to Labour and Davenport Campbell's COP.

Davenport Campbell is committed to upholding the rights of our employees, both current and future, in relation to freedom of association, forced or compulsory labour and the right to collective bargaining. We act legally and responsibly which precludes the use of any form of child labour and we actively support the full abolition of this from within our industry, both locally and internationally.

We are committed to maintaining a diverse workforce, providing equal opportunities regardless of race, gender, culture and ethnicity, religion, age, sexual preference or physical ability.

Nearly 60% of our current workforce are women, with an emphasis on creating opportunities of inclusiveness, freedom from discrimination and bullying that enables all employees and business partners to be treated with respect and courtesy.

Within our overall Company Policies, we maintain comprehensive policies in relation to labour:

- Diversity
- Whistleblower
- Health Safety & Welfare
- Modern Slavery & Human Trafficking

Amongst other non-labour related policy documents.

## DIVERSITY

Our Company Diversity Policy is based on the principles of merit, inclusiveness and valuing the difference and unique story of each of our employees.

## WHISTLEBLOWER

We are committed to providing services in a safe and honest way. We expect everyone to comply with all our policy documents and all legal requirements. We support and respect anyone who acts as a whistleblower to draw attention to suspected inappropriate, corrupt or illegal conduct or behaviour which we will investigate and provide a response based on our policies and principles. We won't retaliate against anyone for raising an alert about suspected misconduct.

## HEALTH SAFETY & WELFARE

Davenport Campbell maintains a documented Health, safety & Welfare Plan whose aim is to have zero workplace accidents or injuries, measure and record any lost time due to occupational and health and safety problems, promote good health and wellness for all our employees and provide a congenial work environment.

## MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Our Modern Slavery and Human Trafficking Policy applies to all directors, employees and contractors collectively of our company.

We have a zero tolerance approach to any form of modern slavery, including child labour and human trafficking within our business and within our supply chain and we are committed to acting ethically and with integrity in all our business dealings and relationships. We continue to implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place in our own business or in any of our supply chains.

**3.**  
**BUSINESSES SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING**

**4.**  
**THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR**

**5.**  
**THE EFFECTIVE ABOLITION OF CHILD LABOUR**

**6.**  
**THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION**

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## IMPLEMENTATION, COMMUNICATION AND AWARENESS

Our company policies make qualifications, skills and experience the basis for the recruitment, placement, training and advancement of staff at all levels.

Each new employee is provided with a comprehensive Employment Contract stating terms and conditions of service, the voluntary nature of employment and the freedom to leave, including the appropriate procedures. We provide the opportunity for consultation and agreement of all aspects prior to engagement.

They are also provided with a Company Onboarding Guide which outlines our business responsibilities, initiatives and procedures.

Training on all our Policies, including non-discrimination and the risk our business faces from modern slavery in its supply chains is provided to all our employees.

Our zero tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners through our Supplier Code of Conduct, at the outset of our business relationship with them and reinforced as appropriate thereafter.

## FUTURE GOALS

Create assessment tools for our Supply Chain to ensure that our level of tolerance can be measured and improved within the next 12 months, exercising influence on subcontractors, suppliers and other business affiliates to combat modern slavery and child labour and are not complicit in any human rights abuses.

## MEASUREMENT OF OUTCOMES

By adhering to our policies and strategies, Davenport Campbell has maintained a good working culture for our employees. We have had no reports or investigations, legal cases, rulings, fines or other events related to any breaches to Labour issues in the past 12 months.

We are promoted through recruitment agencies as an employer of choice and maintain a constant motivated, healthy and gender equal workforce.

Employees have recently undertaken performance appraisals and were given the opportunity for feedback. We recorded a high degree of positive comment on Davenport Campbell's management and respect for individuals and adherence to good business principals in relation to compliance, and development of our employees.

Davenport Campbell is proud to employ a diverse workforce, employing staff of various age groups, cultures and ethnic backgrounds. We promote gender equality with nearly 60% of Women in the workforce, with three Female Directors within the Executive Team.

Fair working conditions and wages are implemented throughout the company in line with the Fair Work Act 2009. All employees recently undertook a Wages Review, with Salaries increased to align with their skills and development goals.

## TARGETED SDGS



# ENVIRONMENT

**7. BUSINESSES SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES**

**8. UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY**

**9. ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES**

This section sets out the UN Global Compact conventions on Principles 7, 8 & 9 relating to the Environment and Davenport Campbell's COP.

## OUR ENVIRONMENTAL POLICY

At Davenport Campbell we recognise that as designers, we have an opportunity to create positive change by reducing the environmental impact of the projects we work on as well as improving the way we operate and manage our own office.

Of these, the projects we design are likely to present the most impactful opportunity to reduce our environmental footprint whilst also improving the health and wellness of the inhabitants of the space.

With this in mind, we strive to be at the forefront of sustainable workplace and building design, so that our designs are the product of an integrated and intensive research and design process. We constantly push our research and development initiatives and form partnerships with organisations such as the University of New South Wales, to engage with the next generation of workforce and how they see the future of Work.

As a responsible business, we continually review and look for opportunities for improvement of the way we operate and communicate this information throughout our studios to create awareness and a collective impact.

We operate in compliance with all relevant environmental legislation including the Protection of the Environment Operations Act 1997 (POEO Act) and through our Environmental Management Plans and utilising instruments such as Authority approvals on projects that require compliance, plus Private Building Certifiers who certify for compliance. These considerations are stated within the POEO Act which outlines protection of the environment policies (PEPs), the objectives for including ecologically sustainable development principles within projects, the impact on the environment of any pollution likely to be caused by an activity or work, plus the relevant statement of environmental effects prepared under the Environmental Planning and Assessment Act 1979. We are committed to fulfilling our compliance obligations and to protecting the environment and eliminating pollution, to the degree that our influence can be exerted.

## ENCOURAGING OUR CLIENTS

We work with our clients to consider the use of sustainable principles when carrying out their projects and introduce them to SWELL, our own sustainability and wellness program. We support our clients' need to meet their project or organisational sustainability goals, whether or not they are aiming to achieve a formal certification.

In the circumstances when no certification or environmental consideration is requested from our client, our aim nonetheless is to deliver sustainable workplace projects within those parameters.

We provide eco friendly and sustainable product choices in our material and product selections and research and investigate the impacts that production may cause on the environment and consider more eco- friendly choices where sustainable economically and commercially.

We understand that sustainability means "meeting the needs of the present without compromising the ability of future generations to meet their own needs". In this pursuit, and also understanding the five pillars of Sustainable Development Goals (SDGs) of people, planet, prosperity, peace and partnership, our aim is to ensure that every intervention into the workplace or built environment not only improves a group or individual's quality of life but also seeks to eliminate waste, curb pollution, and conserve energy and natural resources. This practice consciously aims to avoid the use of materials and products that may be damaging to the environment and indoor environmental quality (IEQ).

We have invested considerably in creating a library of materials and furniture that we know complies with the Green Star calculator requirements whilst still providing choice and value for money.



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## OUR STUDIO

Davenport Campbell recognises the importance to behave in a socially responsible manner concerning the impact of its offices and its work upon the natural environment. As stated earlier, we commit to compliance with all environmental legislation and regulations relating to our design work and office activities. We regard these as a minimum standard of performance and strive to do more. As part of the Environmental Management Strategy, Davenport Campbell is committed to the following:

- Consider environmental impact in all our decision-making and activities.
- Promote environmental awareness among our employees and encourage them to work in an environmentally responsible way.
- Ensure compliance with relevant environmental legislation requirements.
- Include energy and water efficiency as a primary selection criteria when purchasing new equipment.
- Promote efficient use of energy, materials, resources, equipment and products.
- Use suppliers who meet or exceed sustainability requirements.
- Purchase and use environmentally responsible products accordingly.
- Avoid unnecessary use of hazardous materials and products and seek substitutions when achievable.
- We are committed to continuous improvements in environmental performance and the prevention of pollution, social impact and damage that may be caused by our activities.

- We strive to make our environmental commitments an integral part of our day-to-day activities.
- Where required by legislation or where significant health, safety or environmental hazards exist, develop and maintain appropriate emergency response programmes.
- Communicate our environmental commitment to clients, customers and the public and encourage them to support us.
- Strive to continually improve our environmental performance and reduce the impact of our activities by periodically reviewing our environmental policy in the light of our current and planned future activities.
- Encourage the efficient use of materials and resources and the reduction of waste through re-use and recycling.
- Where practical purchase recycled, recyclable or refurbished equipment, products and materials where these alternatives are available, economic and suitable.
- Encourage the use of alternative forms of transport, including cycling, where it is safe and effective to do so.
- Endeavour to reduce the use of air travel as far as possible by the use of alternative communication tools such as video conferencing etc.

## FUTURE GOALS

- Promote the efficient use of energy in the workplace in terms of heating, lighting and equipment usage.
- Review our energy suppliers and switch to green power renewable suppliers.

- Review our current water fixtures and equipment to see if improvements can be made to reduce our water consumption.
- Investigate and review waste processing in conjunction with the building owner.
- Upgrade our library of sustainable materials.
- Take a collective part in environmental initiatives such as Clean up Australia Day.
- Participate in regular Green forums to ensure we are up to date with the latest thinking
- Have members of staff who are accredited with the Green Building Council of Australia
- Prepared an educational document for our clients to inform them of opportunities for furniture reuse to divert waste from landfill.

## MEASUREMENT OF OUTCOMES

By adhering to our policies and strategies, Davenport Campbell has had no reports or investigations, legal cases, rulings, fines or other events related to any breaches to environmental issues in the past 12 months.

We promote efficient use of energy, materials, resources, equipment and products and use suppliers who meet or exceed sustainability requirements.

## TARGETED SDGS



# ANTI-CORRUPTION

## 10. BUSINESSES SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY.

This section sets out the UN Global Compact conventions on Principle 10 relating to Anti-Corruption and Davenport Campbell's COP.

Davenport Campbell is committed to conducting our business ethically and in compliance with all applicable laws and regulations, including the Australian Criminal Code Act 1995 (Cth) and similar laws in other countries that prohibit improper payments, or gifts or benefits, to obtain a business advantage.

Our response to Anti-Bribery and Corruption is a critical component to the delivery of our strategic goal for enduring trust, integrity and resilience and relates to the management of gifts and benefits, either monetary or in kind.

As a responsible business, we strictly prohibit bribery or other improper gifts or benefits in any of our business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises.

A bribe or other improper gift or benefit to secure a business advantage is never acceptable and can expose individuals and our business to possible criminal prosecution, reputational harm or other serious consequences.

We, as a business, define bribery as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages (as defined by Transparency International).

Corruption is the abuse of entrusted power for private gain.

Under our company policy, our employees must:

- not give or accept gifts and/or benefits that will compromise, or appear to compromise, their integrity and objectivity in performing their duties
- not give or accept gifts and/or benefits that cause, or appear to cause a conflict of interest
- record gifts or benefits worth \$100 or more in the Gift and Entertainment Register
- record in the Gift and Entertainment Register where a gift or benefit provided on behalf of our company is in excess of \$100
- decline gifts and/or benefits worth \$400 or more (unless an exception applies)

Our employees are not permitted to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

The policy also applies globally. If travelling outside of Australia, our employees are subject to the laws of the country they are in, however, the principles and standards of Davenport Campbell's policy must be followed regardless of whether that country has specific bribery and corruption laws. In whichever the place, the higher standard of prohibition applies.

Within our industry, there may be some exceptions where a gift or benefit over \$400 may be acceptable, which includes attending work related conferences (excluding flights and accommodation), invitations to speak at a professional association (including flights and accommodation), working lunches or where it may form part of a company sponsorship deal.

If the above occurs, it is expected that the employee discusses the occurrence with their manager before accepting it, to determine the appropriate action.

# ANTI-CORRUPTION

**10.**  
**BUSINESSES SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY.**

## IMPLEMENTATION, COMMUNICATION AND AWARENESS

We provide training for our employees to recognise and consider a transaction as to whether it is considered to be a gift or benefit.

Consideration is based on whether the gift or genuine hospitality or entertainment is reasonable and proportionate and complies with the following:

- made for the right reason – it should be clearly given as an act of appreciation or common courtesy associated with standard business practice
- no obligation – it does not place the recipient under any obligation
- no expectation – expectations are not created by the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction
- made openly – if made secretly and undocumented then the purpose will be open to question
- reasonable value – its size is small and in accordance with general business practice
- appropriate – its nature is appropriate to the relationship
- at “arm’s length” – all transactions/gifts should be at an “arm’s length” basis with no special favours and no special arrangements
- legal – it complies with relevant laws
- documented – the expense or gift, if valued at \$100 or more, is fully documented in the Gift and Entertainment Register

If the value of a gift is not known, this is based on the reasonable person test, i.e. what value would a reasonable person place on the gift?

These circumstances are never acceptable:

- gifts in the form of cash and/or cash equivalents
- “quid pro quo” (a benefit or advantage offered for something in return)
- making incomplete, false or inaccurate entries in the Gift and Entertainment Register

As a responsible business, we recognise other types of payments which we prohibit, in the form of facilitation payments, undeclared political contributions and inappropriate charitable donations, where the donation can be scrutinised as to not conceal bribery.

Within our company code of conduct, all our employees have a responsibility to help detect, prevent and report instances of bribery and corruption as well as any other suspicious activity or wrongdoing in connection with our business. We are committed to ensuring that all employees have a safe, reliable and confidential way of reporting any suspicious activity. Protection for this reporting is outlined in our Whistleblower policy outlined above.

## FUTURE GOALS

Create and maintain appropriate records, including regular reviews of the Gift and Entertainment Register to enable the identification and management of any emerging risks, e.g. if a particular company is presenting a significant number of gifts to various employees or if companies are offering frequent and substantial hospitality to employees.

Internal control systems and procedures will be subject to regular audits and reviews to provide assurance that they are effective in countering bribery and corruption.

## MEASUREMENT OF OUTCOMES

By adhering to our policies and strategies, Davenport Campbell has had no reports or investigations, legal cases, rulings, fines or other events related to any breaches to bribery or corruption issues in the past 12 months.

In the past 12 months, we have run in-house weekly Team Meetings that provide an update on policies and training relating to anti-bribery and recognising acceptable or unacceptable transactions.

## TARGETED SDGS





THANK

YOU

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