



Supplier Code of Conduct

Townsville City Council
Effective April 2026



INTRODUCTION

Townsville City Council (Council), also referred to in this Code as “us,” we, “our” is committed to ethical, sustainable and socially responsible procurement.

We expect the same high standards of our Suppliers.

The Code describes the minimum standards that our Suppliers must achieve, to establish and maintain a business relationship with us.

In this Code, Supplier’s “personnel” includes any directors, officers, employees, secondees, agents, third party contractors, consultants, and subcontractors of the Supplier, and except where the context otherwise requires, “Supplier” includes its personnel.

We comply with the five Sound Contracting Principles as defined under the *Local Government Act 2009*, including in part *environmental protection* and *ethical behaviour and fair dealing* which applies to all suppliers and parties we enter into contracts with.

Application of the Code

The Code applies when a supplier provides goods or services (including construction works and services) to us, regardless of their value.

Suppliers must review the Code and ensure that their personnel, business operations and supply chains meet minimum standards set out in the Code.

The Code does not supersede, alter or diminish a supplier’s legislative, policy, regulatory or other contractual obligations.

To ensure that the Code remains current and relevant, we may amend or update it from time to time.

The Code may also be read in conjunction with the expectations prescribed in the Queensland Government Supplier Code of Conduct effective 1 January 2026 ([Queensland Government Supplier Code of Conduct](#)) and the Commonwealth Supplier Code of Conduct 2024 ([Commonwealth Supplier Code of Conduct | Department of Finance](#)). If there are inconsistencies between this Code and the Queensland Government or Commonwealth Codes, this Code prevails.

Integrity, ethics and corporate governance

We expect high standards of ethical conduct and compliance with all applicable laws.

Ethical conduct

Ethical conduct is considered to encompass, at a minimum - honesty, integrity, transparency, consistency, probity, diligence and fairness.

Suppliers must be ethical in their business activities, including relationships with personnel, other suppliers, departments and agencies, and third parties, and model good corporate governance.

Business integrity

Suppliers must not engage in or facilitate, either directly or indirectly, fraudulent, corrupt, unethical, exploitative, dishonest or collusive activities.

Good business practices

Suppliers must maintain sound management administration, risk and corrective action systems.

Professional conduct

Suppliers must conduct themselves in a manner that is fair, professional and that will not bring us into disrepute. Suppliers must notify us when our employees or other suppliers are not upholding the requirements of our values in this Code.

Confidentiality

Suppliers:

- must ensure they have appropriate systems and processes in place to protect our confidential information and dispose of it appropriately, including in accordance with the applicable contract;
- and
- must not improperly use any private, confidential or commercially sensitive information in their possession, or to which they have access, relating to or in connection with their dealings with us.

Conflict of Interest

Suppliers are required to undertake their business activities with impartiality and must:

- avoid financial, business or other relationships which may compromise or have the appearance of compromising the performance of their duties under their business arrangements with us; and
- disclose any actual, potential or perceived conflicts of interest that arise throughout the procurement process and duration of the contract to the Council representative that is running the procurement process or managing the relevant contract and appropriately manage any such conflicts with the relevant department or agency. This disclosure must occur during all stages of the procurement process in the event a conflict of interest arises.

Gifts, benefits and hospitality

Suppliers must not:

- offer to our employee's gifts or benefits that could reasonably be perceived as influencing them or undermining the integrity of our organisation or themselves; or
- take any action to entice or obtain any unfair or improper advantage from us.

Labour and Human rights

We believe that all personnel in our supply chain deserve to be treated with dignity and respect.

Suppliers must:

- respect the rights and entitlements of their personnel.
- provide a fair and ethical workplace, free from discrimination, workplace bullying, harassment, victimisation and abuse; and
- act against human rights exploitations and make all reasonable efforts to actively support the elimination of modern slavery by identifying and mitigating modern slavery risks along their supply chain in accordance with the objectives of the *Modern Slavery Act 2018 (Cth)*.

Health, safety and security

Personnel health, safety and wellbeing is important to us.

Suppliers must comply with all applicable workplace health and safety laws and regulations.

As well as complying with all workplace health and safety laws and regulations, Suppliers are required to provide a healthy, culturally safe and secure work environment for their personnel and promptly manage any threat to health or safety.

The Queensland Government is committed to ending domestic and family violence. We ask Suppliers to support this commitment by implementing appropriate initiatives within Supplier businesses such as zero tolerance approaches to domestic and family violence or having a workplace domestic and family violence policy in place.

The Queensland Government is committed to ensuring every child has the right to be safe, no matter where they are. The *Child Safe Organisations Act 2024* strengthens our state's culture of safety and wellbeing for all Queensland children. Suppliers that work with children, or provide services and spaces specifically for them, must demonstrate they are child safe and implement the 10 Child Safe Standards

and related reporting requirements of the Act.

Environmental sustainability

Suppliers must maintain environmentally responsible policies and practices in their operations.

Suppliers must:

- comply with laws and regulations relating to the protection of the environment; and
- actively work to minimise the environmental impact of their operations.

Subcontractor payment terms

We want to work with Suppliers that offer payment terms to subcontractors that are no less favourable than those provided to the Supplier by us.

Compliance with the Code

We expect that Suppliers will be proactive in preventing and discouraging breaches of this Code. Suppliers are responsible for breaches of the Code by their personnel.

Suppliers must:

- Proactively self-assess compliance;
- Keep evidence of how they comply with this Code and provide, upon request, evidence and confirmation of their compliance with the Code;
- Communicate the Code to their supply chain;
- Co-operate with us, including to implement remedial action to address breaches of the Code;
- Raise any concerns and report possible or actual non-compliance or breaches of the Code to the Council representative undertaking procurement processes in which the Supplier is participating or the Council representative which manages or is party to the relevant contract with the Supplier; and
- Immediately report any adverse rulings or enforceable undertakings issued by regulatory bodies related to conduct under the Code to the applicable Council representative.

Demonstrating compliance with the Code

Factors relevant to how a Supplier establishes compliance with the Code include:

- The size and sophistication of the Supplier's business; and
- The industry the Supplier operates in.

To achieve compliance with the Code, Suppliers should:

- implement policies and practices that are consistent with the Code; and
- consider holding relevant certifications and accreditations, taking into consideration the Supplier's industry and size.

Refer to *Supplier guidelines for the supplier code of conduct* at **Schedule 1** for more information on how to demonstrate compliance with the Code.

Implications of not complying with this Code

We reserve the right to do business with Suppliers who comply with this Code.

We may elect to not work with or cease to work with Suppliers who do not comply with this Code.

Without limiting our rights under an applicable contract, Suppliers not complying with this Code could lead to one or more of the following actions being taken:

- investigation for breaches of the Code;
- a requirement to implement remedial action to rectify breaches of the Code;
- sharing of information relating to a Supplier's ethical conduct across Council;
- suspension or removal from pre-qualification schemes and panel arrangements (subject to the terms of the scheme or arrangement);
- termination of contracts (subject to the terms of the contract); or
- referral of matters for civil remedy or criminal investigation.

We recognise the importance of working with our Suppliers to provide them with an opportunity for improvement wherever we consider it is appropriate to do so.

Complaints

Any person can report concerns about a Supplier's conduct, or our employee's conduct, to the Council representative undertaking relevant procurement processes in which the Supplier is participating or the Council representative which manages or is a party to the relevant contract with the Supplier.

Alternatively, concerns can be raised directly with the Chief Procurement Officer in writing to:

Chief Procurement Officer
Townsville City Council
103 Walker Street
Townsville 4810, QLD

Or by email to SupplyServices@townsville.qld.gov.au attention: Chief Procurement Officer

Other complaint channels. Complaints about any of the following conduct can also be submitted to the body listed:

- **Fraud or corrupt conduct** - Crime and Corruption Commission Queensland;
- **Maladministration** - Queensland Ombudsman;
- **Serious and substantial waste** - Queensland Audit Office; or
- **Access to government information** - Office of the Information Commissioner Queensland.

SCHEDULE 1 - SUPPLIER GUIDELINES FOR THE SUPPLIER CODE OF CONDUCT

The following sections of these Guidance Notes set out business practices related to the conduct areas in the Code. The list is non-exhaustive and provide examples only. Suppliers may develop other ways to comply with the Code.

Suppliers should seek independent advice and consider what practices are relevant to their business.

1. **Legal and policy considerations.** Within the localities and industry within which it operates, Suppliers should have regard to their obligations under:

- applicable legislation and reporting obligations;
- industry and other relevant standards;
- certifications; and
- state and federal government policies.

2. **Integrity, ethics, and corporate governance.** Suppliers should have regard to how integrity and ethical conduct can be promoted, encouraged and supported within their business. This includes implementing policies and procedures that deal with:

- promptly declaring and managing conflicts of interest that arise throughout the duration of the contract that may be:
 - actual;
 - potential; and
 - perceived.
- keeping full and accurate records of its business activities as legally or contractually required, without falsification or misrepresentation.
- cooperating openly and honestly with any Council audit, assessment, or review.
- undertaking pre-employment screening or background checks of workers.
- not offering Council personnel gifts or benefits, either directly or indirectly. Limiting hospitality to basic courtesy only (such as tea and coffee during a meeting).
- not using Council information for personal benefit.
- complying with all relevant legislation, standards and policies that apply to the localities in which they operate, in addition to any requirements set out in this Code.
- managing its business activities and affairs and conduct themselves professionally and with integrity.
- complying with reasonable standards of ethical behaviour, or the standards of conduct that a reasonable person would otherwise expect of a Supplier to Council.
- not engaging in conduct that could materially harm, or be perceived to harm, the Supplier's character, integrity or honesty.
- being ethical and transparent in their business activities, including relationships between:
 - the Supplier and Council; and
 - with other Suppliers.

Sound corporate governance measures are varied and diverse and may include:

- implementing processes to identify, manage and control relevant risks within its operations.
- performing periodic evaluations or audits of its facilities and operations, and the facility and operations of its subcontractors, relating to:
 - labour and human rights
 - child safety
 - domestic violence
 - health and safety
 - the environment
 - business ethics
 - industry standards
 - corporate governance.
- sharing findings of audits, evaluations and benchmarking openly with Council buyers when requested.
- dealing fairly with subcontractors, such as paying sub-contractors promptly.
- identifying and assessing potential critical incidents, emergency situations and business continuity risks and develop and implement emergency plans and response procedures that minimise these risks.
- using sound administrative processes and best practice corporate management to support transparent operations, including:
 - record keeping;
 - practice reviews; and
 - publicly available reporting, where applicable.

Establishing compliance with confidentiality of systems and processes that include:

- safeguarding the confidentiality of the Council's information.
- safeguarding the integrity of business systems to protect against cyber risks to the Council's:
 - information;
 - networks; and
 - business operations.
- taking precautions to counter potential foreign interference risks to the integrity of the Council.
- complying with any security requirements notified to them by the Council, ensuring adequate protection of:
 - information;
 - assets; and
 - tools and materials.

3. **Labour and human rights.** Achieving compliance with labour and human rights obligations would address:
- complying with relevant employment-related and industrial relations laws and regulations including wages, working hours, leave entitlements and superannuation.
 - complying with National Employment Standards and other relevant employment related and industrial relations laws and regulation.
 - taking reasonable and practicable action to ensure a safe and healthy work environment
 - complying with anti-discrimination laws.
 - providing a workplace free from workplace bullying, harassment, victimisation, and abuse.
 - providing services consistent with human rights obligations.
 - providing a workplace free of modern slavery.
 - monitoring supply chains and addressing human rights standards or any type of modern slavery practice as defined under the relevant legislation.
 - providing a remediation process for workers who have experienced discrimination.
 - providing a culturally safe workplace that reflects the gender make-up and diversity of the Townsville and greater Queensland community.
 - collaborating with Suppliers across the supply chain to identify and communicate the requirements of the Code.
 - providing a workplace where workers have equal access to wages and working conditions based on their skills and experience.
 - allowing workers to:
 - associate with others
 - form and join (or refrain from joining) industrial associations of their choice
 - bargain collectively
 - engage in any lawful industrial activity without interference.
4. **Health, safety, and security.** Achieving compliance with health and safety obligations is multi-faceted and includes:
- complying with all laws relating to workplace health and safety and workers compensation insurance.
 - taking reasonable and practicable action to ensure a safe and healthy work environment.
 - Taking reasonable and practicable action to address domestic and family violence including keeping children safe.
 - providing workplace assessments or procedural manuals for employees to carry out work safely.
 - providing training to manage and reduce occupational health and safety hazards.
 - monitoring and raising these standards within their organisation and their supply chain.
5. **Environmental sustainability.** Establishing environmental sustainability includes:
- complying with laws relating to protecting the environment.

- complying with environmental reporting obligations.
 - implementing business practices that reduce:
 - pollution and the risk of pollution
 - loss of biodiversity
 - deforestation
 - damage to ecosystems
 - greenhouse gas emissions
 - waste production
 - inefficient use of energy, water, and natural resources.
 - taking up use of renewable energy.
 - looking for opportunities to recycle, remanufacture or re-use products after they have served their initial purpose.
 - using and purchasing products made from recyclable material where possible.
 - selecting sustainable Suppliers within the supply chain.
 - disposing of waste in a responsible manner.
 - maximising recycling waste to reduce the volume of waste going to landfill.
 - implementing environmental management procedures.
 - looking for opportunities to improve environmental sustainability.
6. **If a review finds that a Supplier has breached the Code.** A Supplier’s conduct under the Code may be reviewed in accordance with the applicable contract. Following a review, the Council may:
- require a Supplier to put in place a remediation plan to rectify breaches of the Code.
 - share information about a Supplier’s ethical performance within Council.
 - in more serious cases of ethical non-compliance:
 - suspend or terminate a contract with the Supplier in accordance with the termination provisions of that contract.
 - suspend or terminate a Supplier’s participation in a panel or register in accordance with the provisions of that panel or register.
 - If relevant, notify other independent review bodies.