

# Supplier Code of Conduct

## Our Commitment

Investa Property Group (Investa) is committed to conducting all its business in an ethical, legal and professional manner. Further to this, Investa is also committed to integrating the principles of sustainability, encompassing environmental, social and governance (ESG) aspects, Diversity & Inclusion into its business conduct.

As a significant purchaser of a range of goods and services through our operational, capital expenditure projects and corporate activities, Investa is committed to operating with the highest integrity. ESG aspects will be considered in the approach to the procurement of these good and services, and the management of the supply chain.

## Purpose

The Investa Supplier Code (the Supplier Code) sets out the standards Investa requires of suppliers and their sub-tier suppliers (the Supplier), to adhere to when conducting business with Investa.

The Supplier Code communicates Investa's values and expectations and emphasises the importance of responsible workplace policies and practices that comply, at a minimum, with applicable laws and regulations. The Supplier Code communicates the expectations of Investa that suppliers will maintain the spirit and intent of the non-negotiable business principles, as adherence to these are essential to long-term business success. Investa intends to use this document and a supporting contractor management system to achieve business procurement goals and to increase the resilience of Investa's supply chain.

## Scope

The Supplier Code outlines Investa's expectations for all Suppliers, including their parent, subsidiary or affiliate entities, as well as any others with whom they do business, including all employees (including permanent, temporary, contract and migrant workers), upstream suppliers and other third-parties. It is the Supplier's responsibility to disseminate, educate and exercise diligence in verifying compliance with this Supplier Code to their employees, agents and secondary tier suppliers where relevant.

## Non-Negotiable Business Principles

Investa's Code of Conduct comprises a set of key principles which all employees are bound to follow. These form the basis for the Supplier Code of Conduct. The Code is reflected in Investa's business relationships, workplaces and the workplaces of those approved to supply goods and/or services to Investa.

These principles are:

- Acting with honesty and integrity;
- Respecting the law and company policies and acting accordingly;
- Respecting confidentiality and not misusing information;
- Valuing and maintaining professionalism;
- Avoiding conflicts of interest; and
- Striving to be a good corporate citizen and achieving community respect.

## Application

Acknowledgement of the Supplier Code is a prerequisite in every Investa contract for supply. Through the acceptance of a contract or Work/Purchase Order, the Supplier commits that all of its operations are subject

to the provisions set out in the Supplier Code. The standards of the Supplier Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier and Investa.

## Compliance

Investa requires Suppliers to adhere to all applicable laws and regulations and to strive to comply with international and industry standards and best practice. In addition, Investa reserves the right to verify Suppliers' compliance with the Code through internal or external assessment mechanisms. Additionally, Investa maintains standards that explicitly define our expectations for compliance with this Supplier Code.

## Continuous Improvement

Investa recognises that reaching the standards set out in this Supplier Code is a dynamic process and encourages Suppliers to collaboratively and continuously improve their operations. Where required, Investa will cooperate with Suppliers to establish milestones and systems to ensure improvements where necessary. Failure by a Supplier to work to improve their systems shall impact directly on the Supplier's ability to continue to do business with Investa.

## ESG Supply Chain Management System

Investa has developed a process for promoting, requiring, assessing and monitoring ESG practices in its supply chain. This includes:

- Conducting supplier category risk assessments based on a pre-determined criteria covering procurement activities;
- Requiring Suppliers to act in compliance with Investa's Supplier Code and other contractual requirements;
- Assessing and scoring suppliers current and planned approaches to managing ESG aspects in their business and operations relevant to Investa;
- Providing ESG-specific requirements within contract clauses where appropriate;
- Requiring Suppliers to report on their management approaches and performance on an ongoing basis; and
- Regularly monitoring and assessing the ongoing management approaches and performance of some Suppliers, including the potential to identify improvement actions and monitor their implementation.

## Supplier Requirements

### 1. Governance and ethics

- The Supplier must comply with all relevant regulatory requirements in regards to all areas of their business and its operations, including corporate governance, occupational health and safety, labour standards, Diversity & Inclusion and environmental management. This is inclusive of all Australian Federal, State and Territory based regulation.
- The Supplier must act in an ethical, fair and professional manner in all engagement with Investa and its stakeholders, and report instances where these standards are breached.
- The Supplier must have in place relevant and appropriate policies and operational procedures to manage the environmental and social impacts of its business and to promote continuous improvement.
- The Supplier must provide accurate information regarding its business activities, labour, workplace health and safety, and environmental practices and disclose such information, without falsification or misrepresentation, when requested.
- The Supplier must declare any sub-contracting of any services to Investa.

## **2. Risk management and business continuity**

- The Supplier must have a documented risk management process and associated systems that cover all operations.
- The Supplier must have a documented business continuity plan (BCP) that outlines how the organisation responds to disruptive and unplanned events, including BCP roles, responsibilities and communication processes to notify Investa of such events.
- The Supplier must test and refine the BCP on a regular basis, document results and demonstrate improvement opportunities.

## **3. Labour standards and human rights**

- The Supplier must comply with all appropriate legislation relevant to wages and other benefits, including:
  - The Supplier must pay all employees all wages and benefits for a standard working week in accordance with the legislated and contracted amount.
  - The Supplier must provide employees with written, understandable information about their employment conditions in respect to wages and benefits before they enter employment, as well as the particulars of their wages each time they are paid.
  - The Supplier must have appropriate operational procedures in place to ensure all employees and contractors' employees have the legal right and/or relevant visas to work in Australia or their country of employment.
  - The Supplier must have in place operational procedures that allow all employees to exercise their right to bargain collectively and freely join any unions.
  - The Supplier must have appropriate operational procedures to ensure all employees are free to leave their employer after reasonable notice.
  - The Supplier must be committed to providing a workplace in which diversity in all its forms is recognised, embraced and respected.
- The Supplier must have appropriate processes for data collection, monitoring and reporting of labour standards.
- The Supplier must provide employees with an avenue to lodge grievances without fear of reprisal, intimidation or harassment and address all concerns appropriately in a timely manner. This must involve continuously monitoring the grievance mechanism, recording issues that are raised and taking appropriate actions in a confidential manner.
- The Supplier must not discriminate and have in place relevant and appropriate policies and operational procedures to manage anti-discrimination and fair treatment through hiring, remuneration, access to training, promotion, termination and retirement.
- The Supplier must not employ child or forced labour, and must have appropriate policies and operational procedures in place for young workers.
- The Supplier must not use financial deductions as a disciplinary measure for employees.
- The Supplier must not employ workers who are working in a forced, bonded or involuntary capacity, and must not require employees to lodge 'deposits' or hand over their identity papers.
- The Supplier must embrace, encourage and value the contribution of all employees irrespective of difference in terms of age, gender, religion, nationality, ethnicity, sexual orientation, physical appearance, disability, family responsibilities, personal values/beliefs, lifestyle or educational background.

## **4. Environmental management**

- The supplier must seek to conduct its operations in alignment with precautionary principle and cause no environmental harm.

- The supplier must have in place relevant and appropriate environmental policies and operational procedures that ensure regulatory compliance, continuous improvement, appropriate training of employees and address relevant risks.
- Supplier must have appropriate processes for data collection, monitoring and reporting of environmental performance.
- Supplier must not use products or materials that are hazardous or toxic and cause harm to people and the environment. Where possible, products or materials should carry a third party certification outlining their environmental credentials.

#### **5. Supply chain management**

- Suppliers must have in place relevant and appropriate supply chain management policies and operational procedures that require their suppliers to act similarly to how Investa expects its Supplier to act.
- Suppliers must have appropriate processes for data collection, monitoring and reporting of supply chain management.

#### **6. Workplace health and safety**

- The supplier must strive for zero harm and prioritising the health and safety of its employees.
- The supplier must have in place relevant and appropriate workplace health and safety policies and operational procedures that ensure regulatory compliance, continuous improvement, appropriately train employees and address relevant risks.
- Supplier must have appropriate processes for data collection, monitoring and reporting of workplace health and safety performance.
- Supplier must comply with any Investa site-specific workplace health and safety requirements.

### **Policy Information**

**Date Created:** 21 April 2015

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