

# Centuria

## Centuria Supplier Code of Conduct

Centuria Capital Limited (CNI/Company)

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### 1. Introduction

Centuria's objective is to maintain honest, transparent and responsible business practices. The Group, including its listed Real Estate Investment Trusts (REITs), unlisted funds and operations across both Australia and New Zealand are expected to comply with all applicable laws, regulations and standards.

Contractors, sub-contractors, consultants and suppliers, herein referred to as Suppliers, are expected to conduct themselves in line with Centuria's values. The Supplier Code of Conduct (**this Code**) sets out the expectation for Suppliers when engaged with works either directly or on behalf of Centuria.

Suppliers are expected to:

- have read and understood this Code;
- act in accordance with this Code across all its operations and interactions with Centuria;
- abide by all applicable laws, regulations and standards;
- take all reasonable steps to notify Centuria if they are unable to abide by this Code, or applicable laws, regulations and standards;
- take reasonable steps to ensure their own contractors, sub-contractors, consultants and suppliers (**Sub-Suppliers**) also act in accordance with this Code when engaged to perform services or work (including the supply of goods) for Centuria;
- communicate to their own Sub-Suppliers the expectations set out by this Code; and
- comply with all obligations and terms in any contract that it enters into with Centuria (and where such terms are more onerous than the requirements of this Code, comply with the terms of such contracts).

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### 2. Governance and Compliance

Centuria expects its Suppliers to:

- operate with integrity, equitably and in a professional manner;
- maintain accurate records regarding business activities, labour, health and safety and environmental practices in accordance with applicable laws and make such records available to Centuria upon reasonable request;
- ensure contractual obligations for themselves and their own Sub-Suppliers are met;
- comply with all applicable laws, regulations and standards;
- promote fair, safe and ethical business and environmental practices within their own supply chain and third parties, and ensure alignment with this Code;
- disclose any potential, perceived or actual conflicts of interest, including those of their own Sub-Suppliers, agents, and employees; and
- not engage in collusive or anti-competitive behaviour as part of tender and quotation of services to be rendered.

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### 3. Workplace Health and safety

Centuria is focused on prioritising the health and wellbeing of our staff and customers. To support this, Suppliers are expected to:

- take appropriate steps to provide a safe working environment for their own employees and Sub-Suppliers;
- follow any Centuria health and safety directives and site requirements whilst on any Centuria worksites or premises;
- ensure it has sufficient numbers of qualified and competent supervisors;
- prohibit employees from undertaking any work if under the influence of drugs (legal or illegal), alcohol or other substances;
- regularly monitor and enhance health and safety management;
- notify Centuria if they believe they are unable to complete their work safely; and
- report any near misses or incidents to Centuria.

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### 4. Diversity and equal inclusion

Centuria is committed to fostering a culture of diversity and equal inclusion, including amongst the suppliers it engages with across its operations. To support our efforts, Suppliers are expected to:

- have equal employment opportunities (anti-discrimination, anti-harassment) policies which as a minimum meet relevant laws and regulations;
- implement hiring practices and provide a workplace culture that is inclusive of all genders, cultures, sexual orientations, ages, religious beliefs, disabilities or family/marital status;
- respect the traditions and cultures of the communities in which we operate (including the traditional owners in both Australia and New Zealand);
- be committed to a workplace free of unlawful discrimination; and
- be committed to establishing a culture of respect and inclusion through valuing and respecting differences in employees.

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### 5. Environmental management

Centuria's objective is to achieve environmental outcomes that can help to mitigate climate-related risks and enhance opportunities, and is focussed on managing natural resources and minimising waste, and monitoring and reducing energy consumption and greenhouse gas emissions in line with Centuria's emission reduction targets. To support our efforts, Suppliers are expected to:

- comply with all relevant environmental protection laws, regulations and standards;
- adopt an active approach to minimise their environmental impact and footprint, and embed environmental management principles with business operations and processes;
- where practical use products and materials which are from sustainable/renewable sources;
- take reasonable steps to promote and educate its Sub-Suppliers on minimising their environmental impact;

- continually seek to use resources more efficiently and reduce waste; and
- establish processes for data collection, monitoring and reporting of environmental performance (such as the embodied carbon for materials used in construction, fuel and electricity consumption) in accordance with any requirements from Centuria, regulatory obligations, and industry best practice for environmental reporting.

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## 6. Labour and Human rights - including modern slavery

Modern slavery describes a range of labour rights abuses and exploitive conduct which includes slavery, servitude, forced labour, debt bondage and child labour. Centuria seeks to minimise modern slavery in our supply chain. To support our efforts, Suppliers are expected to:

- adhere to laws and regulations on employment, including wages and benefits, equal opportunity and working conditions;
- support social procurement opportunities in their supply chain and with Sub-Suppliers;
- ensure all employees are provided with appropriate training, learning and development opportunities;
- educate and make their own employees aware of modern slavery and how to spot the signs thereof;
- take reasonable steps to collaborate with their own Sub-Suppliers to raise awareness of modern slavery and implement measures to minimise and address modern slavery risks;
- not contribute or conceal cases of modern slavery;
- if requested, provide information pertaining to the risk management and governance approach towards modern slavery;
- report any cases of modern slavery uncovered, either directly through their operations or their own Sub-Suppliers/supply chain; and
- comply with any modern slavery screening requirements, which may be requested by Centuria through a third-party assessment platform.

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## 7. Anti-Corruption and Anti-Trust

Centuria is committed to ensuring compliance with anti-corruption and anti-trust laws. To support our efforts, Suppliers are expected to:

- comply with all applicable anti-corruption and anti-trust laws;
- not engage in conduct such as bribery in an attempt to influence a decision or obtain a benefit for Centuria;
- not attempt to obtain favourable treatment from Centuria through its employees by making bribes;
- report any indication of improper payment;
- refrain from engaging in anti-competitive conduct, including misleading or deceptive conduct, price fixing schemes or misuse of market power; and
- take appropriate measures to establish and maintain policies and procedures aimed to prevent corruption, bribery or anti-competitive behaviour.

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## 8. Data protection and privacy

Centuria collects information, for the purposes of use and disclosure to the extent necessary to meet its business requirements and that is permitted by applicable laws, regulations and standards. To support our efforts, Suppliers are expected to:

- adopt reasonable safeguards to protect Centuria's sensitive information;
- have appropriate cyber security controls, including training, testing and hardware/software controls to manage internal and external cyber threats;
- safeguard workers' personal information and ensure compliance with all relevant legal, regulatory and contractual obligations concerning its collection, storage, use, and sharing; and
- promptly advise Centuria if there is any potential or actual data breach which may cause sensitive information to be accessed by a third party.

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## 9. Products and materials

Centuria is committed to using quality products and materials. To support our efforts, Suppliers are expected to:

- ensure all products and materials meet applicable laws, regulations and standards and manufacturer's specifications;
- have a systematic approach to testing the integrity of products and materials;
- upon reasonable request, provide evidence supporting products and materials meet the applicable quality standards.

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## 10. Assessment

Centuria may carry out assessments of its Supplier's practices from time to time for alignment with this Code, including by way of self-assessment, requests for additional information or visits to the Supplier's premises (if relevant), based on identified risks.

Suppliers are expected to respond openly and honestly to any requests for information, and cooperate with Centuria to facilitate any assessments, as well as any corrective action required to address any non-compliances.

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## 11. Raising a Concern

Centuria expects that all Suppliers actively self-assess compliance with this Code, as well as assessing compliance of its subsidiaries or supply chain. Suppliers are expected to take timely steps to report and remedy any breaches or potential breaches of this Code.

If a Supplier considers or suspects that another party engaged by Centuria has breached its obligations under this Code, the Supplier is encouraged to report its concerns to Centuria.

Centuria has a whistle-blower process to anonymously raise concerns regarding breaches on compliance or ethics when working for or with Centuria.

To raise a concern, please email Centuria at [compliance@centuria.com.au](mailto:compliance@centuria.com.au).