

# Centuria

## Centuria Supplier Code of Conduct

Centuria Capital Limited (CNI/Company)

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### 1. Introduction

Centuria is committed to 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 document), 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 the Supplier Code of Conduct (this document);
- Abide by all applicable laws, regulations and standards;
- Take all reasonable steps to notify Centuria if they are unable to abide by the Supplier Code of Conduct, or applicable laws, regulations and standards; and
- Communicate to their own suppliers the expectations set out by Centuria's Supplier Code of Conduct.

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### 2. Governance and compliance

Centuria expects its suppliers to:

- Operate with integrity, equitably and in a professional manner;
- Ensure contractual obligations for themselves and their own suppliers are met;
- Comply with all applicable laws, regulations and standards;
- Disclose any potential or actual conflicts of interest, including those of their own suppliers, agents, subcontractors and employees; and
- Not engage in collusive or anti-competitive behaviour as part of tender and quotations of services to be rendered.

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### 3. Health and safety

Centuria is committed to providing a safe workplace for its employees, suppliers, customers and the communities in which we operate. To support this commitment, suppliers are expected to:

- Take appropriate steps to provide a safe working environment for their own employees and suppliers;
- Follow any Centuria health and safety directive;
- 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 believes suppliers and their employees deserve equal opportunities to work and to participate in tendering and providing quotations as part of our works. To support our efforts, suppliers are expected to:

- Have Equal Employment Opportunity (anti-discrimination, anti-harassment) policies which as a minimum meet relevant laws and regulations;
- 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); and
- Be committed to a workplace free of unlawful discrimination.

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### 5. Environmental management

Centuria is committed to minimising its impact on the environment, and is committed to using natural resources efficiently, responsibly and where possible from sustainable/renewable sources. 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;
- Where practical use products and materials which are from sustainable/renewable sources; and
- Continually seek to use resources more efficiently and reduce waste.

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## 6. 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 is committed to identifying and resolving any modern slavery practices across our operations. To support our efforts, suppliers are expected to:

- Educate and make their own employees aware of modern slavery and how to spot the signs thereof;
- Collaborate with their own suppliers to raise awareness of modern slavery;
- Not contribute or conceal cases of modern slavery;
- If requested, provide information pertaining to the risk management and governance approach towards modern slavery; and
- Report any cases of modern slavery uncovered, either directly through their operations or their own suppliers/supply chain.

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## 7. 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; and
- 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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## 8. 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;
- 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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## 9. Raising a concern

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)**.