

Supplier Code of conduct

Effective Date: December 2023

Creating extraordinary places and
experiences that connect, enrich and
are essential to our communities

1 Purpose

Scentre Group is committed to high standards of ethical conduct and to promoting and supporting a culture of ethical behaviour and sound corporate governance.

Ethical business and personal behaviour are fundamental to our purpose – Creating extraordinary places and experiences that connect, enrich and are essential to our communities – to our values – referred to as our ‘DNA’ - and to our culture.

In line with our purpose, we aspire to have a positive impact on the communities and environments in which we operate and to conduct and maintain responsible and sustainable business operations.

Through this code we seek to encourage and, where appropriate, mandate requirements to help us and our suppliers in conducting business in a safe, accountable and equitable manner. Our suppliers are required to observe this code, and other applicable Scentre Group policies, in delivering products or services to us as part of our approach to contracting and procurement.

2 Corporate governance and management

Scentre Group believes that sound corporate governance is integral to the conduct of responsible and sustainable business operations. Suppliers are expected to:

- (a) comply with all applicable laws and regulations relating to the operation of their business;
- (b) have in place processes and procedures to manage the risk of fraud, bribery, corruption, facilitation payments, secret commissions, money laundering or dealing with sanctioned entities;
- (c) develop, implement and promote an effective ‘whistleblower’ policy and processes including protections for whistleblowers against reprisal and other adverse action;
- (d) conduct their operations in an ethical, fair and professional manner, and disclose any actual or potential conflicts of interest to Scentre Group;
- (e) protect, and take reasonable steps to prevent the release of, commercially sensitive or confidential information;
- (f) maintain adequate, accurate and auditable records of their business and financial activities;
- (g) meet their contractual obligations to us and their own suppliers; and
- (h) proactively manage their risk, governance and compliance obligations.

3 Diversity, equity and inclusion

Scentre Group is committed to the ethical and fair treatment of its team members (our employees, our contractors, our suppliers, their employees and contractors). All team members deserve a workplace where they feel safe, respected and appreciated. Suppliers are expected to:

- (a) commit to a workplace free from bullying, harassment, victimisation, abuse and unlawful discrimination of any kind. This includes, but is not limited to, supporting Scentre Group’s zero tolerance to any form of unwelcome sexual conduct in any area of our organisation and maintaining a working environment free from sexual harassment by taking all reasonable measures to eliminate sexual harassment, sex-based harassment, sex discrimination, conduct creating a workplace environment that is hostile on the ground of sex, and related acts of victimisation in the workplace

- (b) provide an inclusive workplace free of any direct or indirect discrimination, including gender, intersex status, age, ability, sexual orientation, gender identity, marital or family status, race, ethnicity, religious beliefs, political opinion, industrial activity, or cultural background;
- (c) develop, implement and promote anti-discrimination, anti-harassment and equal employment opportunity policies and adhere to any applicable Scentre Group policies in this regard;
- (d) foster a diverse and inclusive culture, by valuing and embracing differences in their team members
- (e) encourage gender balance in the workforce, through appropriate policies and initiatives which specifically target the advancement of gender diversity

4 Workplace health and safety

Health, safety and welfare is fundamental to our success. We actively promote a culture of people protecting people and the safety of our people, our workers, our retailers, customers and visitors is paramount.

Suppliers are expected to:

- (a) comply with all applicable laws and regulations relating to workplace health and safety;
- (b) ensure a safe and clean working environment is provided for their employees and contractors;
- (c) take reasonable steps to identify, manage and minimise occupational health and safety hazards;
- (d) provide appropriate equipment, resources, instruction, education, supervision and job-related training for workers to safely carry out their duties;
- (e) develop, implement and promote written health and safety policies and standards; and
- (f) adhere to any applicable Scentre Group workplace health and safety policies and procedures.

5 Environment

Scentre Group is committed to minimising the environmental impact of its operations, and in turn expects its suppliers to recognise and reduce any adverse environmental effects from conducting its business. Suppliers are expected to:

- (a) comply with all applicable laws and regulations relating to the environment, including but not limited to environmental management, protection and reporting obligations;
- (b) take active steps to identify, manage and minimise material environmental risks or harm associated with their operations;
- (c) implement strategies to maximise the efficient consumption of energy, water, natural resources and raw materials;
- (d) minimise waste, pollution, loss of biodiversity, deforestation and damage to ecosystems;
- (e) develop, implement and promote environmental policies, standards and training of team members; and
- (f) adhere to any applicable Scentre Group environmental policies.

6 Labour and employment practices

Scentre Group believes appropriate labour and employment practices are fundamental to any workplace. Suppliers are expected to:

- (a) have in place processes and procedures to assess and address risk in their labour and employment practices, including in respect of human rights, employee conditions and entitlements, and modern slavery;
- (b) ensure no instances of modern slavery occur in their operations and supply chain, comply with all applicable laws and regulations relating to modern slavery, including the prohibition of forced or child labour, and report any concerns to Scentre Group;
- (c) comply with all applicable laws and regulations relating to human rights, employment conditions, including freedom of association, collective bargaining, working hours, wages, benefits and entitlements;
- (d) participate in any audits conducted by Scentre Group, including acting on any findings from those audits;
- (e) maintain grievance management mechanisms to provide the means for workers to raise grievances about their workplaces and management practices that are clear, consistently applied, equitable to the parties involved and transparent;
- (f) ensure that their team members are made aware of their modern slavery risks and risk management strategies, grievance mechanisms, and employee entitlements;
- (g) inform Scentre Group of any grievances raised which relate to a Scentre Group workplace and implement appropriate processes to monitor and track how those grievances have been reported and resolved and
- (h) inform their team members of Scentre Group's Whistleblower Protection Policy and Grievance Management Policy.

7 Risk management

Scentre Group recognises the importance of mitigating business risks in a timely manner. Suppliers are expected to:

- (a) take active steps to identify, manage and control business risks associated with their operations, including but not limited to operational risks as well as risks relating to physical security, information security, cyber security, labour, business ethics, legal and regulatory compliance, corporate governance and the environment;
- (b) implement and maintain a comprehensive insurance program, business continuity plan and appropriate risk management framework across the organisation; and
- (c) proactively escalate any issues and related action plans connecting with the provision of goods or services to Scentre Group in a timely manner.

8 Supply chain management

It is important to Scentre Group that suppliers, as well as their supply chains, comply with the principles in this code. Suppliers are expected to:

- (a) communicate and encourage compliance with this code within their business and supply chain; and
- (b) proactively work with their own supply chain to adhere to these principles.

Scentre Group, through its Reconciliation Action Plan, proactively supports Aboriginal and Torres Strait Islander owned businesses by procuring goods and services from Aboriginal and Torres Strait Islander owned businesses where feasible. We encourage our suppliers to also consider committing to their own reconciliation action plans and procuring by procuring goods and services from Aboriginal and Torres Strait Islander owned businesses where feasible.

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Scentre Group Limited
ABN 66 001 671 496

Scentre Management Limited
ABN 41 001 670 579

RE1 Limited
ABN 80 145 743 862

RE2 Limited
ABN 41 145 744 065

scentregroup.com

Level 30, 85 Castlereagh Street
Sydney NSW 2000 Australia

GPO Box 4004
Sydney NSW 2001 Australia