

Supplier Code of Conduct

February 2019



Introduction

In alignment with our corporate values, Charter Hall Group (the Group) is committed to promoting ethical, environmental, and social standards throughout our supply chain, which include contractors, sub-contractors, consultants and our suppliers (Suppliers) who conduct business in a safe, responsible and equitable manner and in compliance with all applicable laws, regulations and standards.

By Suppliers, we mean any organisation that provides products or services to the Group.

The intent of the Supplier Code of Conduct (Code) is to share our commitment and principles and clearly communicate the Group's expectations of our Suppliers – including throughout their own supply chains – in providing products and services to us. Suppliers to Charter Hall must review this Code and confirm that their organisations and their extended supply chain conform with its expectations and requirements.

Governance and general compliance

Good corporate governance provides a foundation for professional, responsible and ethical business practices.

Suppliers are expected to:

- Ensure they meet their contractual obligations to us and their own suppliers.
- Comply with all applicable laws, regulations and standards.
- Manage their risk, governance and compliance appropriately, with senior management responsibility and accountability clearly identified.
- Provide influence and guidance within their own supply chain and related third parties to adopt a fair, safe and ethical approach to business and the environment, and to demonstrate commitment to this Code.
- Provide a full disclosure of any actual or potential conflict of interest that the supplier, or any of its employees, agents and subcontractors, may have in relation to the duties being performed.
- Not engage in any collusive or anti-competitive conduct in the preparation of quotations or tenders.
- Commit to the provision of relevant training, learning and development opportunities for all employees.

Social responsibilities

Labour and Human Rights

The Group respects human rights as set out in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, the UN Global Compact and relevant Australian human rights and modern slavery legislation and the Charter Hall Group's Human Rights Policy.

Suppliers are expected to:

- Manage their operations in a way that respects human rights, as set out in the UN Guiding Principles on Business and Human Rights.
- Ensure compliance with relevant laws affecting forced or involuntary labour, child labour, discrimination and security practices.
- Ensure that company products, services or facilities are not used for human trafficking and/or labour or sexual exploitation and other modern slavery type conditions.
- Not engage in practices relating to or subcontracting to organisations that employ child labour at any stage of the manufacturing or service delivery process.
- Abide by all key international standards and domestic regulations relating to the employment of children, and maintain a clear policy stating the company's position on Human Rights.
- Not use forced, bonded or involuntary labour so that, for example, workers are free to leave after their shift ends, or to resign their employment after giving reasonable notice.
- Allow freedom of association and collective bargaining for workers to join or form trade unions of their own choosing and to bargain collectively.
- Comply with relevant laws and regulations in relation to employment practices, wages and benefits, working conditions, and equal opportunity.
- Encourage social procurement opportunities in their supply chain.

Diversity, Equal Employment Opportunity (EEO) and Anti-Discrimination

The Group is committed to providing an environment in which employees have equal access to opportunities available at work, are treated with fairness and respect, and are not judged by unlawful or irrelevant reference to their attributes.

The Group will conduct its business with suppliers in a fair and reasonable manner and in keeping with this code.

Suppliers are expected to:

- Have Equal Employment Opportunity (EEO), anti-discrimination and anti-harassment policies in place which meet or exceed requirements of any relevant laws where the product is made, or service delivered.
- Ensure hiring practices are not based on personal characteristics including, but not limited to gender, ethnic origin, age, religious beliefs or practices, family responsibilities / parental status / marital status, pregnancy, disability, sexual identity and physical appearance.
- Be committed to establishing a culture of respect and inclusion through valuing and respecting differences in their employees.
- Be committed to a workforce free of harassment and unlawful discrimination, and to ensure this commitment extends to all aspects of workplace relations.
- Provide a workplace that is free of direct and indirect discrimination, harassment, and bullying and ensure this commitment extends to all aspects of workplace relations.
- Promote “zero” tolerance of unlawful discrimination and harassment.
- Consider and treat equally all employees, including providing equal treatment, or treatment that is different but considered equivalent in terms of rights, benefits, obligations and opportunities.
- Foster gender balance and greater diversity in the workforce, including leadership and senior executive ranks.
- Provide fair pay and working conditions for employees including adequate rest periods, leave, minimum wage requirements, freedom of association and collective bargaining.
- Require that suppliers of unskilled labour and services use accredited labour-hire agencies.

Environmental management

The Group recognises the importance of minimising environmental impacts and is proactive in measuring and reducing its environmental footprint through our own operational activities and indirectly through the activities of our suppliers.

Suppliers are expected to:

- Meet all relevant local and national environmental protection laws, regulations and standards as well as strive to comply with international environmental protection standards.
- Actively manage the environmental impact of their operations and take responsibility for minimising the negative impact of their products and services throughout their lifecycle.
- Embed environmental management principles within business operations and processes.
- Continuously seek ways to maximise the efficient use of energy, water, resources and raw materials and minimise waste and pollution, especially greenhouse gas emissions and assessed and developed a climate change mitigation plan.
- Establish and maintain processes for data collection, monitoring and reporting environmental performance in accordance with local regulatory requirements and industry best practice for environmental reporting.

Workplace health and safety

The Group is committed to promote a culture of health and safety awareness and practice that ensures risks in the workplace are identified, assessed and eliminated or controlled.

Suppliers are expected to:

- Comply with all legal responsibilities under applicable legislation of the countries in which they operate.
- Provide a safe and clean environment for employees, visitors and third parties, by managing risk and employing safe systems of work and with appropriate training to perform their jobs safely.
- Develop and maintain Workplace Health and Safety policy and procedures that is appropriate to the size of the company and nature of risk and meets relevant legislative requirements.
- Review and improve the management of health and safety on a regular basis.
- Make available to Charter Hall an appropriate health and safety plan that documents the management of risks relating to works being conducted on behalf of Charter Hall, and in the case of hazardous goods or substances, a Material Safety Data Sheet.
- Have established appropriate grievance and whistle blower mechanisms to allow staff and other stakeholders to anonymously raise issues if concerned.

Community engagement and development

The Group prefers suppliers who are actively engaged and contribute to the local communities which the Supplier impacts and support their sustainable development.

Risk management

The Group views effective risk management as key to achieving operational and strategic objectives.

Suppliers are expected to:

- Have specifically included material environmental, social and governance aspects in the in their risk management frameworks.

- Have a business continuity plan that is maintained and tested to minimise business impacts in the event of major disruption, which is integrated across business units and regularly tested.
- Strive to have a written emergency response plan, to minimise harm to employees, the local community and local environment in the event of a site disaster, which is integrated across business units and regularly tested.
- Have appropriate information security policies and procedures in place to secure access to our information.

Managing ‘responsible’ procurement

Charter Hall has developed a process for promoting Corporate Social Responsibilities (CSR) practices in our supply chain. As part of this process, the Group undertakes the following:

1. Planning:

- Assess threats and opportunities and identify priorities for the procurement project.

2. Sourcing:

- Requires principle Suppliers to be compliant with the Code, and its requirements.
- Evaluates CSR weightings of potential Suppliers during the tender process in line with identified CSR threats and opportunities.
- Consider the Supplier’s location and if warranted, conduct site visits if appropriate, based on identified risks.
- Incorporates contract clauses within our Standard Supplier Agreements to ensure acknowledgment and adherence to the Code.

3. Contract Management:

- Request and review Supplier practices and documentation necessary to demonstrate conformance with this Code throughout the contract management and annual review process.
- Expects Suppliers to measure and continually improve their CSR practices.

4. Reporting:

- Undertakes to publicly disclose its performance against the Code in its sustainability report or annual review.
- Have established appropriate grievance and whistleblower mechanisms to allow suppliers and other stakeholders to anonymously raise issues if concerned.

Supply chain management

The Group has a responsibility to shareholders and key stakeholders to ensure its entire supply chain adheres to its principles. Charter Hall is committed to helping Suppliers comply with the Code and in turn, expect Suppliers to require their own suppliers to comply with the Code.

Suppliers are expected to:

- Communicate this Code to their own organisation as well as their supply chain, so that all are aware of, and comply with this Code.
- Proactively work with their own suppliers and confirm the principles within this Code are met.
- Demonstrate a willingness and commitment to comply with this Code of Conduct.

Assessment

Charter Hall Group reserves the right to carry out regular assessments of the practices of its Suppliers to confirm alignment with this Code. This may include self-assessment by Suppliers, or a request for additional information, or site visit, if appropriate, based on identified risks.

Suppliers are expected to:

- Respond in full and be open and honest in response to any request for information.
- Complete an agreed corrective action plan until a satisfactory level of improvement is reached should any breaches or shortcomings regarding the Code be identified.

Failure to comply or address non-compliance with this Code may result in contract termination.

Privacy and confidentiality

Information supplied to the Group will be recorded on Charter Hall systems and will be maintained and used in accordance with relevant legislation, including the Privacy Act 1988 and the Corporations Act 2001, to the extent that the legislation applies to the information. Confidential information will not be disclosed to any parties outside the Group, unless required under law, without the consent of the organisation that the information relates to.

Charter Hall’s Privacy Policy outlines our privacy commitment and explains how we collect, use, disclose and protect our customers personal information. Privacy is a non-negotiable part of how we work. Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers’ personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations. This includes suppliers not doing anything which would cause Charter Hall to be perceived as acting inconsistently with our Privacy Policy or the Australian Privacy Principles.



Contact

If you have any concerns about compliance or ethics issues while working for or with Charter Hall or want to report illegal or unethical activities, email: groupriskcompliance@charterhall.com.au

All matters raised in good faith through these reporting lines will be handled in a confidential manner.

Alternatively, you may raise concerns anonymously via the following channels:

Phone: 1800 173 918

Email: protecteddisclosure@deloitte.com.au

Mail: The Protected Disclosure Service
Reply Paid
12628 A'Beckett Street
VIC 8006

