



Supplier Sustainability Code of Practice

23 March 2017

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1. Introduction

Vicinity Centres (Vicinity) has one of the largest portfolios of centres in Australia and with this comes the opportunity to collaborate with our suppliers to create shared value and enrich community experiences. We aim to develop and maintain effective working relationships with suppliers that are aligned with our values, principles and commitment to sustainability, and through this enhance the positive impacts of our business activities and minimise any negative outcomes to society and the environment. As such, Vicinity commits itself to the following Code and we request the same from our suppliers.

The Supplier Sustainability Code of Practice (Code) describes Vicinity's minimum expectations of suppliers in the areas of governance, community investment, environmental management and social responsibility. Vicinity will take into consideration a supplier's ability to meet and exceed the standards in the Code when making procurement and management decisions for all existing, new and prospective suppliers. The Code forms an important component of Vicinity's procurement processes and contracts with our suppliers.

We encourage all our suppliers to review the Code regularly to ensure relevant areas of their business and supply chains meet these standards. The intention of the Code is to foster mutually beneficial relationships with our suppliers who can offer solutions that minimise environmental and social impacts in the provision of goods and services throughout the full life from manufacturing to transport, and consumption to end of life.

In this Code, when we refer to a supplier, we mean any entity that supplies products or services to Vicinity.

2. Related documents

The following documents and tools should be used as key reference points in applying the Code:

- **Integrated Sustainability strategy:** Sustainability is integrated into our corporate strategy and is a key value driver for Vicinity and our stakeholders,
- **Procurement Policy and Sustainable Procurement Policy:** Guides our approach to procurement, including how we manage sustainability risks, impacts and opportunities in our supply chain,
- **Supplier Sustainability Questionnaire:** To help us better understand the sustainability performance and aspirations of existing and prospective suppliers, and
- **Community, Environment and Human Rights Policies:** Outline key standards we set for ourselves in all aspects of our operations.

3. Governance

Suppliers should develop, maintain and implement policies consistent with this Code and maintain appropriate management systems to demonstrate compliance with the Code. Vicinity expects that our supplier's environmental and social risks and opportunities are integrated into the organisation's governance practices and risk management frameworks at the Board and Executive levels.

We expect suppliers of Vicinity will:

- Comply with all applicable local and national laws and regulations,
- Not commit, or become involved in, bribery, corruption, fraud or money laundering of any form, including facilitation payments,
- Maintain a whistle blower policy that allows violations, misconduct, or grievances to be reported by workers and addressed without fear of retaliation,
- Ensure timely disclosure of important sustainability matters concerning any products or services provided to Vicinity, and
- Have appropriate systems and processes to manage and report the progress of their social and environmental performance.

4. Environmental management

Vicinity is committed to being environmentally sustainable in all our activities. We value solutions that minimise energy and resource use, create minimal waste and pollution, and anticipate environmental issues and manage them at the source. We seek to work with suppliers who provide us with products and services that incorporate environmental sustainability considerations wherever possible. We take a collaborative approach to our relationships with our suppliers to achieve shared sustainability objectives.

We expect suppliers of Vicinity will:

- Comply with all relevant national and international laws, regulations and standards with regard to environmental performance, management and reporting,
- Have a written Environment Policy that is communicated to employees and business partners,
- Have an environmental management system to manage the impact of their operations on the environment,
- Take responsibility for minimising the negative environmental impacts of their products and services, including across the product or service's entire life cycle, and
- Maintain suitable sustainability certification related to their products (e.g. sustainable forestry certification for timber products).

5. Social responsibility

Vicinity's business is built on the skills and commitment of its people. We understand that we need highly engaged people to deliver on our purpose of enriching community experiences, and this is why we are committed to fostering a culture where our people feel valued, are passionate and inspired to succeed. We seek to work with suppliers who have established and implemented plans and frameworks to monitor and manage risks and opportunities associated with their own social responsibilities, and expect the appropriate identification and proactive management of key issues such as human rights, labour practices, health and safety, and equal employment opportunity as a minimum.

We expect suppliers of Vicinity will:

- Comply with all relevant local and national laws and regulations in relation to employment practices, including relevant labour instruments regarding wages,
- Conduct business activities in a manner that respects and supports the principles on human rights, as set out in the International Bill of Human Rights¹, and the eight fundamental Conventions of the International Labour Organisation.²
- Comply with all relevant health and safety legislation and maintain appropriate health and safety policies and procedures to manage health and safety risks,
- Provide an equal employment opportunity work environment that is free from bullying, harassment, discrimination and other unacceptable forms of behaviours, and
- Provide an inclusive and supportive working environment that values employee diversity.

6. Community investment

At Vicinity, we understand the significant roles our centres play as local hubs for economic activity, social interactions, entertainment and services that define community lifestyles and experiences. We achieve our purpose of enriching community experiences by enhancing community connection and making a meaningful difference to society through the way we operate, manage and develop our centres. We strive to make genuine positive difference by creating more opportunities for economic participation, access and inclusion, and enhancing the overall community resilience and wellbeing of the communities in which we operate. Vicinity seeks to work with suppliers that are also committed to fostering the social and economic development of the communities in which they operate.

We expect suppliers of Vicinity will:

- Have in place procedures and systems to identify local stakeholders or communities of interest, and consult with and engage these stakeholders and communities on important issues, and
- Establish strategic, long term partnerships and programs with community organisations and other stakeholders that deliver benefits to local communities.

¹ International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.

² The ILO conventions address freedom of association, collective bargaining, forced labour, minimum age, worst forms of child labour, equal remuneration, and discrimination (employment and occupation).

7. Supplier diversity

Vicinity is committed to building a supplier portfolio that reflects the diversity of our retail partners, customers and communities in which we operate, and which offers a wide range of innovative and sustainable capabilities and solutions. An important part of Vicinity's supplier diversity strategy is to increase our engagement with social enterprises that contribute to creating thriving communities. We actively seek opportunities to work with suppliers whose business activities alleviate unemployment within disengaged and disadvantaged youth groups (the key focus of Vicinity's own community investment program). We also value partnerships with suppliers who are working to address other diversity and inclusion related causes where options are not available to support disengaged and unemployed youth, for example Indigenous or women-owned businesses, or disability enterprises. This supports Vicinity's commitment to diversity and inclusion more broadly, and enables us to deliver positive outcomes in our communities through our business operations. To this end, we encourage our suppliers to mirror this commitment to supplier diversity and inclusion in their own supply chains, particularly in the supply of goods or services to Vicinity.

8. Supply chain management

The business conduct and performance of our suppliers, as well as companies in their supply chains, can have a direct impact on the sustainability of our business, including Vicinity's brand and reputation. As such, we are committed to helping our suppliers comply with the Code and in turn, expect our suppliers to require their own suppliers to comply with the Code.

We expect that suppliers to Vicinity will:

- Acknowledge and demonstrate a willingness and commitment to comply with the Code,
- Ensure that the Code is properly communicated to their employees and their relevant suppliers, and
- Work with their own suppliers to ensure the standards in the Code are met.

9. Assessment and review

Vicinity will work closely with suppliers to ensure they meet the standards of the Code. This may include assessments of supplier practices, periodic requests for additional information or site visits. Throughout this process, our objective is to work with our suppliers to identify best practice and support continuous improvement.

We expect suppliers of Vicinity will:

- Respond in full and be open and honest to all information requests, and provide all requested supporting documentation,
- Cooperate with Vicinity in carrying out site reviews where required, and
- Complete agreed action plans to achieve compliance with this Code should any breaches or shortcomings be identified.

Vicinity's Supplier Sustainability Questionnaire is the main avenue through which we gather important information regarding the sustainability performance of our suppliers. We may ask our suppliers to complete the questionnaire prior to engagement, every three years and also in the event of a material change in the ownership of a supplier or change in provision of the services provided by a supplier to Vicinity. All suppliers for which Vicinity's risk assessment process triggers the completion of the Supplier Sustainability Questionnaire will be required to review and provide updated responses as a minimum every three years.

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