

Supplier Code of Conduct

Our Commitment

Investa Management Pty Ltd and its related bodies corporate (**Investa**) is committed to conducting its business in an ethical, legal, respectful and professional manner. Further to this, Investa integrates the principles of sustainability, encompassing environmental, social and governance (ESG) aspects to its business conduct. As a significant procurer of a range of goods and services (either for the organisation itself or on behalf of its clients) Investa is committed to operating with the highest integrity. ESG aspects will be considered in the approach to the procurement of these good and services, and the management of the supply chain.

Purpose

This Investa Supplier Code of Conduct (**Supplier Code**) sets out the standards Investa requires suppliers and their sub-tier suppliers (**Suppliers**), to adhere to when providing services to Investa.

The Supplier Code communicates Investa's values and expectations and emphasises the importance of responsible workplace policies and practices that comply, at a minimum, with applicable laws and regulations. The Supplier Code communicates the expectations of Investa that Suppliers will operate within the spirit and intent of the non-negotiable business principles. Investa intends to use this document and a supporting contractor management system to deliver on our commitments and increase the resilience of Investa's supply chain.

Scope

This Supplier Code outlines Investa's expectations for all Suppliers, including their parent, subsidiary or affiliate entities, as well as any others with whom they do business, extending to all employees (permanent, temporary, contract and migrant workers), upstream suppliers and other third-parties. It is the Supplier's responsibility to disseminate and educate their employees, agents and second-tier suppliers where relevant and exercise diligence in verifying compliance with this Supplier Code.

Non-Negotiable Business Principles

Investa's Code of Conduct comprises a set of key principles which all employees are bound to follow. These form the basis for the Supplier Code. The Supplier Code is reflected in Investa's business relationships, workplaces and the workplaces of those approved to supply goods and/or services to Investa.

These principles are:

- Acting with honesty and integrity;
- Engaging in respectful behaviours and creating a safe work environment;
- Respecting the law and company policies and acting accordingly;
- Respecting confidentiality and not misusing information;
- Valuing and maintaining professionalism;
- Avoiding conflicts of interest;
- Striving to be a good corporate citizen and achieving community respect;
- Ensuring ethical treatment of employees/workers, and

- Incorporating responsible procurement practices.

Application

Acknowledgement of the Supplier Code is a prerequisite in every future Investa contract for supply. Through the acceptance of an Investa procurement contract or Work/Purchase Order, the Supplier commits that all of its operations are subject to the provisions set out in the Supplier Code. The standards of the Supplier Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a Supplier and Investa.

Compliance

Investa requires Suppliers to adhere to all applicable laws and regulations and to strive to comply with international and industry standards and best practice. In addition, Investa reserves the right to verify Suppliers' compliance with the Supplier Code through internal or external assessment mechanisms. Additionally, Investa maintains standards that explicitly define our expectations for compliance with this Supplier Code.

Continuous Improvement

Investa recognises that reaching the standards set out in this Supplier Code is a dynamic process and encourages Suppliers to improve their operations collaboratively and continuously. Where required, Investa will cooperate with Suppliers to establish milestones, processes and systems to manage improvements where necessary. Failure by a Supplier to work proactively to improve their processes and systems shall be considered grounds to discontinue the Supplier's ability to do business with Investa.

ESG Supply Chain Management System

Investa has developed a process for promoting, requiring, assessing and monitoring ESG practices in its supply chain. This includes:

- Conducting supplier category risk assessments based on pre-determined criteria covering procurement activities;
- Requiring Suppliers to act in compliance with the Supplier Code and other contractual requirements;
- Assessing and scoring Suppliers' current and planned approaches to managing ESG aspects in their business and operations relevant to Investa;
- Providing ESG-specific requirements as contained in any contract where appropriate;
- Receiving supplier reporting relating to their management approaches and performance on an ongoing basis;
- Monitoring and assessing our key Suppliers' ongoing management approach and performance, including the potential to identify improvement actions and monitor their implementation, in accordance with the project activity or phase; and
- Participating in third party assessments, where Suppliers are expected to be transparent with their policies, processes and records and allow assessors full access to workplace premises, workers and records.

Grievance and notification mechanisms

Suppliers are:

- to advise Investa of issues of significance associated with the delivery, either directly or indirectly of products or services for Investa as soon as reasonably practical.
- to disclose to Investa any government sanction, embargo, or restriction in any jurisdiction applying to the Supplier and/or any of its own supply chains as soon as they have been formally notified.

Investa has an anonymous whistleblower method for our employees and suppliers (including their employees and contractors) to raise any responsible procurement, sourcing concerns and grievances

identified in the course of providing products or services to Investa. Grievances and notifications should be directed to whistleblower@investa.com.au. Investa employees can also use the anonymous Whistleblower reporting link found in our internal GRC System.

Supplier Requirements

1. Governance and ethics

The Supplier is to:

- comply with all relevant regulatory requirements relating to all areas of its business and operations, including in relation to corporate governance, workplace health and safety, labour standards, employment law, human rights and modern slavery and environmental management. This is inclusive of all Australian Federal, State and Territory based regulations.
- act in an ethical, fair and professional manner in all engagements with Investa and its stakeholders, and report instances where these standards are breached.
- have in place relevant and appropriate policies and operational procedures to manage the environmental and social impacts of its business and to promote continuous improvement.
- provide accurate information regarding its business activities, labour, workplace health and safety, and environmental practices and disclose such information, without falsification or misrepresentation, when requested.
- disclose, prior to their engagement, their intention to use sub-contractors for any services to be provided at Investa managed sites.

2. Risk management and business continuity

The Supplier is to have a documented risk management process and associated systems that cover all operations.

- Suppliers providing critical services to Investa must have a documented business continuity plan (BCP) that outlines how their organisation responds to disruptive and unplanned events, including BCP roles, responsibilities, and communication processes to notify Investa of such events.
 - The Supplier is to test and refine the BCP, document results and demonstrate improvement opportunities, in accordance with contractual requirements and leading industry standards.
- The Supplier will be required to provide an annual insurance certificate of currency as part of the Investa vendor management requirements.

3. Labour standards and human rights

The Supplier is to comply with all applicable employment legislation relevant to wages and other employment benefits, including:

- all laws dealing with the wages and compulsory superannuation the Supplier pays its employees and the hours they work.
- appropriate operational procedures in place to enable all employees and their sub-contractors' employees to have the legal right and/or relevant visas to work in Australia or their country of employment.
- operational procedures that allow all employees to exercise their right to bargain collectively and voluntarily join any unions.
- appropriate operational procedures to enable all employees to be free to leave their employer after reasonable notice.
- a commitment to providing an inclusive workplace in which diversity in all its forms is recognised, embraced and respected.

The Supplier is to:

- create a safe and respectful work environment for all engagements with Investa and its stakeholders, ensuring it is free from harassment, everyday sexism and disrespect.
- have in place relevant and appropriate human rights policies and operational procedures that meet regulatory compliance, facilitates continuous improvement, addresses relevant risks, including modern slavery risks, and ensure appropriate training of its employees is provided.
- have appropriate processes for data collection, monitoring and reporting of labour standards.
- provide employees with an avenue to lodge grievances without fear of reprisal, intimidation or harassment and address all concerns appropriately in a timely manner. This must involve continuously monitoring the grievance mechanism, recording issues that are raised and taking appropriate actions in a confidential manner.
- not discriminate and have in place relevant and appropriate policies and operational procedures to manage anti-discrimination and fair treatment through hiring, remuneration, access to training, promotion, termination and retirement.
- not employ child or forced labour and must have appropriate policies and operational procedures in place for young workers.
- not use financial deductions as a disciplinary measure for employees.
- not employ workers who are working in a forced, bonded or involuntary capacity, and must not require employees to lodge 'deposits' or hand over their identity papers.
- embrace, encourage and value the contribution of all employees irrespective of difference in terms of age, sex, religion, nationality or ethnicity, sexual orientation or gender identity, physical appearance, illness or disability, family responsibilities, political beliefs, pregnancy, marital status or social origin.
- foster gender balance and inclusion in the workforce, leadership pipeline and senior executive ranks, track progress against its targets, and provide Investa with information on actions and progress as requested.
- be encouraged to procure products and services that utilise social and/or Indigenous enterprises in its supply chain to Investa and as requested provide Investa with information on this procurement. The supplier may be requested, from time to time, to provide information on different workforce characteristics, such as gender and cultural background, including, but not limited to, employees who identify as First Nations people.

4. Environmental management

The Supplier will:

- seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions, recognising that the adverse effects on the community, environment and natural resources must be minimised and/or mitigated to safeguard the health and safety of the public and environmental impact. This includes utilising energy efficient equipment as part of their services.
- not use products or materials that are hazardous or toxic and cause harm to people and the environment. Where possible, the Supplier shall promote the use of environmentally friendly products and materials that have recycled or bio content, are reused, durable, maintainable, and designed for disassembly to facilitate repair and material recovery. Where practical, the Supplier should carry a third-party certification outlining the products and materials environmental credentials, including Environmental Product Declarations.
- shall dispose of all waste correctly and implement appropriate waste recycling schemes, where applicable.
- have in place relevant and appropriate environmental policies and operational procedures that

meet regulatory compliance, facilitate continuous improvement, address relevant risks and ensure appropriate training is provided to their employees.

- have appropriate processes for data collection, monitoring and reporting of environmental performance.
- be encouraged to identify their environmental credentials, including their pathway to net zero emissions.

5. Supply chain management

Suppliers will:

- have in place relevant and appropriate supply chain management policies and operational procedures that require their suppliers to act similarly to how Investa expects its Suppliers to act.
- have appropriate processes for data collection, monitoring and reporting of supply chain management.

6. Workplace health and safety

The Supplier is to:

- strive for zero harm and prioritise the health and safety of its employees and people within its supply chain.
- have in place relevant and appropriate workplace health and safety policies and operational procedures that meet regulatory compliance, facilitates continuous improvement, addresses relevant risks and ensure appropriate training of its employees is provided.
- have appropriate processes for data collection, monitoring and reporting of workplace health and safety performance.
- comply with any Investa site-specific workplace health and safety requirements

7. Cyber and Data Security

- The Supplier shall implement and maintain appropriate cyber security controls, including but not limited to multi-factor authentication, encryption, and secure system configuration.
- The Supplier must comply with all applicable privacy laws.
- In the event of a cyber incident or data breach affecting Investa's data or systems, the Supplier must notify Investa immediately and cooperate fully in any investigation or remediation.
- The Supplier is responsible for ensuring that all subcontractors and third parties engaged in providing services to Investa adhere to these requirements.
- Investa reserves the right to audit the Supplier's cyber security practices and require evidence of compliance.

Policy Review

This policy will be reviewed by the ESG Committee and the IMH ARC annually.

Policy Information

Responsibility: Chief Operating Officer, Real Estate

Date Created: 21 April 2015

Date Last Reviewed: 17 October 2025

Revision History:

Supplier Code of Conduct Version	Date Released	Accountable	Description
1.0	21 April 2015	General Manager Corporate Sustainability	
2.0	10 April 2017	General Manager, Facilities Management	Updates to principles and commitments
3.0	18 October 2024	General Manager, Corporate Sustainability, Head of Environment & Chief Operating Officer, Real Estate	Updates to principles and commitments
4.0	17 October 2025	Chief Operating Officer, Real Estate	Updates to principles and commitments