



Supplier Code of Conduct

Purpose of this Code

This Code outlines Our minimum expectations of You and Your Representatives.

We partner with suppliers who:

- Support, embrace and enact environmental sustainability.
- Align with Our purpose for delivering social outcomes and community benefits.
- Operate in a legal, ethical and socially responsible way.
- Are willing to join Us in strengthening Our response to Modern Slavery.
- Are committed to high standards of transparency and ethical conduct.
- Provide a safe working environment.
- Have policies and practices in place that encourage fair work practices, diversity and equal employment opportunity.
- Want to support other suppliers in promoting ESG.

We are committed to taking a proactive approach in ensuring Our business standards consider the Environmental, Social and Governance (ESG) impacts of Our operations and supply chains, in the Australian and global markets.

We encourage You to communicate this Code to Your Representatives and help them to understand and adopt Our expectations as outlined in this Code.

Application

This Code applies to all procurement We undertake and to all of Our suppliers.

We may enter in a contract with You that contains specific provisions addressing matters that are covered in this Code. To the extent that there is any inconsistency between this Code and a contractual term, the specific provisions of the contract will prevail.

This Code is not intended to alter Your obligations under any laws, regulations, codes of practice or other applicable standards.

Definitions

ESG guidelines, standards and frameworks include but are not limited to the following:

- (a) United Nations Sustainable Development Goals (UNSDG);
- (b) ESG Reporting Standard for Australian Community Housing by Community Housing Industry Association (CHIA ESG standard)
- (c) Other relevant standards, guidelines and frameworks in the Australian context.

Modern Slavery is defined in the *Modern Slavery Act 2018* (Cth) and includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage or other form of involuntary or illegal labour; deceptive recruiting for labour or services; and the worst forms of child labour.

Modern Slavery Laws means any legislation (and any binding or non-binding guidelines issued by any entity or person so authorised under Modern Slavery Law), applicable in Australia including but not limited to the *Modern Slavery Act 2018* (Cth), *Modern Slavery Act 2018* (NSW),



and/or otherwise applicable to Us or You from time to time with respect to reporting on and/or addressing the risks of Modern Slavery in business operations and supply chains.

Representatives refers to Your subsidiary/ies, subcontractor/s, employee/s and authorised representative/s, and any third parties that act for You or on Your instructions, as applicable.

We, Our, and Us refers to St George Community Housing Limited and its subsidiaries.

You, and Your refers to any supplier, contractor or consultant engaged by Us.

Compliance with all relevant laws and standards

You must always comply with all relevant laws, regulations, codes of practice or other applicable standards.

Confidentiality and data security

You must not use or disclose information You receive because of Your engagement with Us, for any purpose other than which it was provided, without Our prior written approval, unless required by law.

You must notify Us of any actual, potential, suspected or threatened data breach which has, or may have, resulted in unauthorised access to information or loss of information that We have provided to You immediately.

Modern Slavery

We believe that all business enterprises should respect human rights and address any adverse impact their business practice has or may have on human rights. All people have the right to protection from exploitation, violence and abuse.

We are committed to taking a proactive approach in ensuring Our business standards effectively address the risks of modern slavery occurring in Our operations and supply chains.

We are required to report on Our compliance with Modern Slavery Laws on an annual basis. This includes reporting on the actions We have taken to address any actual or potential risks of Modern Slavery in our operations or our supply chain.

We understand that some of Our suppliers may not meet the reporting threshold under the Modern Slavery Laws.

However, as part of Our obligations under the Modern Slavery Laws, and Our commitment to partnering with ethical and socially responsible suppliers, We require You to take all reasonable steps to ensure that You and Your Representatives do not engage in practices that constitute Modern Slavery.

You must not do, or omit to do, anything that will cause Us to breach Modern Slavery Laws.

Risk Assessment and due diligence processes

You must take reasonable steps to prevent, mitigate and remediate the risk of Modern Slavery, and unlawful activity occurring in Your operations and supply chains.

We expect You to:

- Make all reasonable efforts to ensure that Your and Your supply chain do not engage in Modern Slavery
- Never use child labour or any form of forced, bonded, indentured, involuntary or illegal labour
- Respect human rights, and workers' rights and freedom of movement



Reporting and auditing

We have obligations under Modern Slavery Laws which may require Us to undertake a review of Your compliance or the compliance of Your Representatives.

We expect You to cooperate with any reasonable requests We may make for assistance and/or information which may include but is not limited to information relating to:

- Your business structure, operations and supply chain
- The risks of Modern Slavery and unlawful activity in Your and Your Representative's operations and supply chains
- Actions taken by You and Your Representatives to assess and address those risks, including due diligence and remediation processes
- How You and Your Representatives assess the effectiveness of such actions
- The training that You provide to Your Representatives about Modern Slavery and unlawful activity
- The process of consultation about Modern Slavery, and unlawful activity between You and any of Your Representatives

Anti-bribery, anti-corruption

You must not engage, directly or indirectly, and must ensure that Your Representatives do not engage, in fraud, bribery, corruption, exploitation or other criminal activity.

We will refer any allegation of fraud, bribery, corruption, exploitation or other criminal activity to the appropriate authorities.

Conflicts of Interest

You must ensure that any actual, potential or perceived conflicts of interest relevant to Your engagement with Us are disclosed to us as soon as possible.

We expect that You will make prompt, full and frank disclosure of all matters that could give risk to a conflict of interest, and work with Us to implement any processes or steps We require to manage the risk to Us.

Gifts and Benefits

Giving gifts to Our employees is generally discouraged.

We have a Gifts and Benefits Policy that Our staff must comply with. This means that We may decline gifts and benefits offered to Us. Alternatively, if a gift, or series of gifts, valued at over \$30 is accepted, it will be declared and recorded.

Health and safety

We expect that You will:

- Have appropriate work, health and safety management practices and systems in place
- Provide training to Your Representatives so that they work in a safe, accessible, and hygienic environment
- Direct Your Representatives to observe and comply with Our work, health and safety management practices and systems if Your Representatives attend Our offices or premises to provide services
- Provide a workplace free of intimidation, discrimination, bullying, threatening, psychological, physical and/or verbal abuse.



-
- Comply with any other requirements that We notify You of, particularly if You are providing services to Our Customers
 - Support the physical and mental health of Your Representatives

Diversity and Inclusion

We promote and seek diversity across Our supply base. We value difference and diversity and the perspective that it brings.

We expect You:

- to promote Aboriginal and/or Torres Strait Islander representatives within Your organisation and supply chain.
- to promote supplier diversity by seeking equitable, mutually beneficial opportunities with a broad range of businesses, for example: small and medium-sized enterprises (SMEs), social enterprises, women-owned businesses, businesses that support and employ people with disabilities, and LGBTIQ+ owned businesses.
- to treat Your Representatives with dignity and respect. We expect you to value and promote diversity and inclusion within Your business.
- do not discriminate Your Representatives on grounds of gender, gender identity or expression, age, citizenship, ethnicity, race, religion, language, genetic information, marital status, sexual orientation, political opinion, disability or medical condition, family arrangements, cultural backgrounds, or any other attributes protected by law.

Environmental Sustainability

We are committed to working with Suppliers who promote a culture that values the environment and demonstrate a commitment to reducing negative environmental impact.

You must comply with all minimum standards provided by environmental legislation and regulation, including holding any required environmental licences where relevant. We expect that:

- You consider reducing the carbon footprint of your products and services and other corporate activities, and pathways to contribute to Australia's net zero emissions target by 2050
- You understand the environmental impact from your products and services, and consider actions to mitigate or minimise these risks
- You consider the preservation of biodiversity and greenspace through your operations, and prohibit unlawful eviction and unlawful taking of land, forests and waters
- You consider the reduced use of pollutants and materials harmful to the environment from your products and services
- You consider the increased use of environmentally friendly sourced materials for your products
- You consider reducing waste and consider applying circular economy principles in your operations
- You consider the reduced use of wasteful water in your operations



Social Responsibility

You promote ethics and a culture that values the people directly affected by your products and services (including your employees, customers, and other stakeholders) and a commitment to uphold these values.

We expect that:

- You comply with our expectations set out in this Code
- You ensure to protect your employees', customers', as well as the public's life and health, against hazards inherent in your products and services
- You have put in place arrangements to enable customers to provide feedback for the provision of Your products and services
- You align with Our purpose to delivery social outcomes and community benefits through the provision of your products and services
- You consider creating or increasing positive community impact through Your operations

Record keeping

We expect You and Your Representatives to keep complete, proper and accurate records as required by applicable laws and standards.

If We reasonably request provision of records held by You or Your Representatives that arise in connection with the services You, or Your Representatives have directly or indirectly provided to Us, We will expect that You will comply with Our request promptly and in good faith.

Compliance

You are expected to comply with this Code and take reasonable steps to avoid and prevent any breach.

We also expect that You have systems in place to monitor Your compliance with this Code and will notify us within 10 Business Days of You becoming aware of any actual, suspected or potential breach of the Code by You or Your Representatives.

If You suspect that You, one of Your Representatives, or one of Our employees or anyone acting on behalf of Us are in breach of this Code, or if you have any questions about this Code, please get in touch with Us through your contact at St George Community Housing Limited or email us at legal@sgch.com.au.

Alternatively, Our Commitment to acting ethically and transparently is reflected in Our Whistleblower Policy, which is available on Our website (sgch.com.au). If You are concerned about conduct that may be reportable under our Whistleblower Policy, You may make a confidential disclosure in accordance with that Policy.

Referral action to proper authorities will be taken in cases involving breaches of criminal law.