

What Stockland Expects from its Suppliers

Stockland is committed to responsible procurement and sustainable supply chain management. We acknowledge that we deal with a wide and varied range of suppliers, and endeavour to build partnerships with suppliers that operate in a manner which is consistent with our values and standards by considering social, environmental and human rights-related factors in our procurement decisions.

Our expectation is that our suppliers and their supply chain undertaking work in Australia comply with Australian federal, state and local laws and regulations including but not limited to labour laws, environmental regulations and workplace health and safety standards. Where a supplier's operations occur outside Australia, our expectation is that you comply with legislation in the country(ies) of operation as well as the ten principles of the United Nations Global Compact. When overseas entities undertake operations in Australia, we expect you to comply with Australian federal, state and local laws and regulation.

Our procurement guidelines give preference to Suppliers who demonstrate corporate responsibility and sustainability policies and practices which align with Stockland's corporate values, objectives and standards. This document outlines the additional corporate human rights responsibility and sustainability practices which we consider when making key procurement decisions.

We acknowledge that human rights risks and impacts relate not only to our business activities, but also the relationships within our supply chain. We encourage the respect of human rights in our dealings with key suppliers by monitoring adherence to relevant corporate policies and management methods.

We look to our suppliers and their supply chain to have formal policies or guidelines which indicate their overarching approach towards sustainability and corporate responsibility. The following table provides guidance on how we expect all suppliers to operate and promotes policy inclusions that underpin ethical operations.

Governance and Management	Conduct business in an honest and responsible way, including having policies or guidelines covering:	
	Policy / Guideline	Objective
	Human Rights	Provide ethical employment by supporting and promoting the rights of employees and your supply chain to create a vibrant, safe and inclusive work environment. A Human Rights policy statement should: <ul style="list-style-type: none"> • Address acceptable living conditions and corporal punishment and disciplinary practices; and • Reference the policies/ guidelines listed below.
	Conflict of Interest	Act in an ethical and professional manner at all times, and disclose to Stockland any actual, potential or perceived conflicts of interest.

	<table border="1"> <tr> <td>Fraud and corruption</td> <td>Do not engage in any form of extortion, bribery, corruption, or fraud.</td> </tr> <tr> <td>Code of Conduct and Ethical Behaviour</td> <td>Do not offer suppliers or customers gifts, inducements or entertainment to gain improper advantage or preferred treatment.</td> </tr> <tr> <td>Whistleblowing</td> <td>Provide a mechanism to report any complaints made by employees, customers or your supply chain about activities or operations which have caused concern.</td> </tr> <tr> <td>Privacy Policy</td> <td>Comply with the Privacy Act 1988 (Cth) ("Privacy Act") in Australia. Suppliers operating outside of Australia are expected to operate in line with EU GDPR and comply with legislation of their country(ies) of operation regarding data privacy and protection. A privacy policy / guideline should describe your respect for data privacy in how you collect, use, store, disclose and manage your clients, customers and employees' personal information.</td> </tr> <tr> <td>Procurement</td> <td>Commit to sustainable sourcing. Set this out in a policy which defines the principles guiding your procurement activities, and the procedures which employees must follow when selecting suppliers.</td> </tr> <tr> <td>Procure to Pay Policy</td> <td>Ensure your supply chain is paid on time and set out your invoice payment terms and methods in a policy statement.</td> </tr> </table>	Fraud and corruption	Do not engage in any form of extortion, bribery, corruption, or fraud.	Code of Conduct and Ethical Behaviour	Do not offer suppliers or customers gifts, inducements or entertainment to gain improper advantage or preferred treatment.	Whistleblowing	Provide a mechanism to report any complaints made by employees, customers or your supply chain about activities or operations which have caused concern.	Privacy Policy	Comply with the Privacy Act 1988 (Cth) (" Privacy Act ") in Australia . Suppliers operating outside of Australia are expected to operate in line with EU GDPR and comply with legislation of their country(ies) of operation regarding data privacy and protection. A privacy policy / guideline should describe your respect for data privacy in how you collect, use, store, disclose and manage your clients, customers and employees' personal information.	Procurement	Commit to sustainable sourcing. Set this out in a policy which defines the principles guiding your procurement activities, and the procedures which employees must follow when selecting suppliers.	Procure to Pay Policy	Ensure your supply chain is paid on time and set out your invoice payment terms and methods in a policy statement.
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Environment	<p>Take a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility.</p> <table border="1"> <thead> <tr> <th style="background-color: #0070C0; color: white;">Policy / Guideline</th> <th style="background-color: #0070C0; color: white;">Objective</th> </tr> </thead> <tbody> <tr> <td>Environment Policy</td> <td> Have a positive and proactive approach to the environment and communities including: <ul style="list-style-type: none"> • Comply with legislative and regulatory requirements as a minimum standard. • Mitigate and manage the environmental risks and impacts associated with your business activities and your supply chain. </td> </tr> </tbody> </table>	Policy / Guideline	Objective	Environment Policy	Have a positive and proactive approach to the environment and communities including: <ul style="list-style-type: none"> • Comply with legislative and regulatory requirements as a minimum standard. • Mitigate and manage the environmental risks and impacts associated with your business activities and your supply chain. 								
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		<ul style="list-style-type: none"> • Implement strategies to enhance energy efficiency, improve water management, and reduce waste in operations. • Large construction projects have an Environmental Management System. • Endeavour to use materials that are recycled or reused, have low embodied energy and reduce resource usage. • Encourage the development of environmentally friendly technologies.
	Stockland's Sustainability Programme and Policy can be viewed here: https://www.stockland.com.au/sustainability .	
Health and Safety	Implement work, health and safety standards across operations.	
	Policy / Guideline	Objective
	Health and Safety Policy	Health, safety and welfare must always be a business priority. Your actions and policy should: <ul style="list-style-type: none"> • Provide a safe and healthy workplace for employees and contractors, with appropriate information, instruction, training, and supervision. • Respect customers and their health safety and security in all activities. • Encourage employees and contractors to identify workplace hazards or opportunities for health, safety and welfare improvements in the way you do business. • Identify, eliminate or minimize, so far as reasonably practicable, risks from identified workplace hazards by: <ul style="list-style-type: none"> ○ Establish and report against measurable targets that track and verify progress and improvement. ○ Provide necessary information, education, training, instruction and supervision to support people in doing their work safely.

		<ul style="list-style-type: none"> ○ Comply with applicable health, safety and welfare legislation.
Human Rights	Respect and promote human rights in the workplace, and supply chain where applicable.	
	Policy/Guideline	Objective
	Anti-Discrimination and Harassment	<p>Actively manage workplace and supply chain labour practices to ensure all employees can work in an inclusive environment where they can meet their full potential. A policy would be expected to include company statements on managing:</p> <ul style="list-style-type: none"> • Discrimination, such as: gender, race, religion and sexuality. • Harassment: physical, verbal or non-verbal which is unwelcome. • Bulling: repeated and unreasonable behaviour towards a person. • No victimisation of people who report & vilification of people from a different race, gender, sexuality etc.
	Grievance	Provide a mechanism for staff, stakeholders and customers to raise concerns about unacceptable behaviour in good faith, while also offering protection from victimisation, harassment or disciplinary proceedings.
Labour	Implement labour policies and guidelines across the organisation, including:	
	Policy / Guideline	Objective
	Labour Rights	<ul style="list-style-type: none"> • Uphold the freedom of association. • Elimination of all forms of forced, compulsory and child labour; or other forms of Modern Slavery as defined by the Australian Federal Modern Slavery Act 2018. • Remuneration and Work Hours Policy (including minimum living wages, and maximum working hours).

	Diversity and Inclusion	Building the awareness and capability of the workforce to embrace diversity and flexibility. <ul style="list-style-type: none"> • Maximising diversity in leadership positions, in particular the proportion of women in management roles. • Creating a more inclusive workplace.
Social Value	Actively engage with the communities in which your business operates, including: <ul style="list-style-type: none"> • Respect, engage with, and contribute to local communities, including where practicable through stakeholder engagement initiatives. • Source labour, goods and services from local communities when this is appropriate and practicable. • Support indigenous employment and procurement programs whenever appropriate and practicable. • Develop and maintain a Reconciliation Action Plan. Medium and Small business discuss if a reconciliation action plan is appropriate. 	
Capability and Capacity	Have proven capability and capacity to deliver sustainable outcomes, and collaborate with us, where possible, on environmental, community and other initiatives set out in this document.	

Reporting and Reviews

At Stockland, we use contract reviews, reporting, performance reviews, and audits to manage our partnerships with key suppliers, and we expect our partners to conduct similar activities. We encourage our partners and their supply chain who undertake physical works e.g. construction and maintenance to obtain confirmation of their certification and provide training to their suppliers on these expectations. Examples are: [CM3](#), [Isosafe](#) and [Greencap](#). Our [sustainability reporting website](#) has additional information on our approach to supply chain management and annual performance reporting.

Supporting Corporate Governance is our Code of Conduct which is supported by the following policies. These can be found using this [link](#).

- Code of Conduct and Ethical Behaviour
- Diversity and Inclusion Policy
- Fraud and Corruption Policy
- Privacy Policy
- Sustainability Policy

- Reconciliation Action Plan
- Human Rights Policy
- Health & Safety Policy
- Whistleblower Policy

Contact for questions and reporting concerns

For direct queries about this document or our procurement practices, please contact procurement@stockland.com.au.

If you have any concerns regarding an improper state of affairs or conduct, please contact Stockland using either of our Whistleblowing channels:

- Email our Whistleblower Protection Officers at whistleblowing@stockland.com.au; or
- Anonymously through our external website [Tell me](#).

Any matters raised will be handled confidentiality, and without risk of retaliation as per our Whistleblowing Policy.

This version was reviewed and approved by the Board on 21/10/2019