

Supplier Code of Conduct Compliance

Approver's name and title:

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Classification



Vita Partners Supplier Code of Conduct

The Vita Partners Code of Conduct explains the standards that Vita Partners expects of its employees in the conduct of its operations. It supports Vita Partners' Core Values of Excellence, Agility, Partnership, Accountability, Diversity, and Integrity.

This Supplier Code of Conduct (Supplier Code), as embedded in our supply chain contracts, sets out our expectations and seeks to apply Vita Partners' Core Values in partnership with our third-party suppliers, consultants, vendors and contractors (Suppliers).

In accordance with the contractual arrangements with our Suppliers, Suppliers are, at a minimum, obliged to comply with the laws and regulations of the country/s in which they operate, including laws relating to health and safety, sustainability and the environment, labour practices, modern slavery, materials quality, anti-trust, anti-money laundering, anti-terrorism, anti-corruption and data protection.

Suppliers to Vita Partners are expected to:

- have read and understood this Supplier Code;
- act consistently with this Supplier Code throughout their operations and apply it in their dealings with Vita Partners;
- take reasonable steps to communicate this Supplier Code to all employees, subcontractors, agents, suppliers or other third parties in their own supply chains with whom they engage in the performance of services or the supply of goods to Vita Partners (Supply Chain); and
- use reasonable endeavours to ensure Suppliers' own Supply Chains also act consistently with this Supplier Code.

Supplier commitment to the principles of this Supplier Code will be considered when making procurement decisions and building relationships with our Suppliers.

Unless superseded by the terms of the contract, Suppliers must comply with all obligations in any contract that a supplier may have with Vita Partners. Where those terms are more onerous than the standards under this Supplier Code, Suppliers shall adhere to the contract terms.

Corporate Governance

Suppliers to Vita Partners are expected to:

- conduct business with integrity and in a fair, equitable and professional manner; and
- declare any interest they have, that may conflict or be perceived to conflict with Vita Partners.

Such conflicts are to be brought to the attention of Vita Partners' compliance team by the Vita Partners' Procurement team responsible for the Supplier.

Accountability

Vita Partners' Project Construction Management and Property Management teams on each project and asset are to ensure that the requirements of this Code of Conduct are fulfilled and that these factors are considered during procurement, to the extent that Vita Partners is in control of the procurement process and holds the supply chain contract.

Health and Safety

We believe in putting people's safety and wellbeing first, and expect our Suppliers to:

- take steps to proactively assess 'What's the worst that could happen?' scenarios and apply controls to eliminate or mitigate the risk of incident and injury;
- adhere to the Global Minimum Requirements (GMRs)

https://cdn.prod.website-files.com/67986a59e31820c98cd29dcd/6864b6d9a8b361a93bef656a_2021%20GMRs%20Document.pdf for environment, health and safety on all Vita Partners projects;

- understand and follow any Vita Partners health and safety directives and site requirements whilst on any Vita Partners worksite or premises;
- speak up and stop any tasks or items of work that are, or could become, unsafe;
- provide adequate numbers of competent supervisors; and
- not allow a worker to undertake work when the worker's job performance is impaired by drugs (legal or illegal), alcohol or other substances, and report any incidents occurring on Vita Partners worksite or premises to the Vita Partners team.

Sustainability and Environmental Management

To create the best places, Vita Partners aims to work with Suppliers to promote sustainable economic growth, vibrant and resilient communities and cities, a healthy planet and healthy people.

Vita Partners has a long-term aspiration to minimise waste, be powered by clean energy, and create more usable water than we consume.

Vita Partners encourages Suppliers to offer sustainable alternatives when providing goods and services to deliver more sustainable outcomes.

Suppliers are expected to:

- strive to reduce environmental harm, to the extent reasonably practicable and appropriate, by maximising the efficient use of natural resources, energy, water and raw materials and minimise pollution (including greenhouse gases pollution) and waste;
- where relevant, implement and maintain a written environmental policy which meets or exceeds the guidelines for such policies as set out in ISO14001:2015, and where required, observe recognised sustainability accreditations;
- take reasonable steps to educate their Supply Chains on the lifecycle of products and materials sourced and on ways to reduce their environmental footprint;
- strive to implement measures to promote climate change resilience, adaptation and mitigation; and
- co-operate with Vita Partners to measure and track the sustainability performance of goods and services supplied to Vita Partners.

Labour Policies, Human Rights and Non-Discrimination

Vita Partners is committed to fostering a culture of diversity and inclusion which respects internationally recognised human rights. We honour the United Nations Universal Declaration of Human Rights.

We support the United Nations Global Compact and are striving to implement the 10 Principles of that Compact. We expect our Suppliers to treat others with trust, dignity, respect, fairness and equity.

Suppliers are expected to:

- strive to reduce or avoid contributing to adverse human rights impacts through fair and ethical sourcing practices;
- advance an inclusive workplace free of discrimination, harassment, bullying and other unlawful behaviour;
- not use any form of child, forced or involuntary labour, nor use physical punishment to discipline employees;
- ensure all persons engaged to work (either directly, or through recruitment agencies), hold all legal work permits and visas;
- respect the rights of workers to choose freely to associate with one another and to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment; and

- support participation, where reasonably practicable, in training programs for their workers on Vita Partners projects, to enhance the level of their professional skills.

Modern Slavery

Modern slavery is a term which describes a range of extreme labour rights abuses and exploitative conduct including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment practices and child labour. Raising the awareness of all officers, employees, contractors, suppliers, and service providers to the risks of modern slavery in our operations and supply chains is fundamental to the successful implementation of a Modern Slavery program. Each person involved in the work of Vita Partners has a responsibility to consider and assess the risk that Vita Partners' operations or supply chains may involve the use of modern slavery in the production or sourcing of goods or the performance of services.

Suppliers are expected to:

- take all reasonable steps to source labour, products, services and materials from sources free of modern slavery;
- promote education and awareness of modern slavery risks within their own operations;
- collaborate with Vita Partners to manage modern slavery risks within their Supply Chains;
- take reasonable steps to work with their Supply Chains to implement measures to assess, minimise and address modern slavery risks and encourage greater sourcing transparency; and
- upon reasonable request by Vita Partners, provide to Vita Partners traceability data and other relevant information regarding modern slavery risks in their operations and Supply Chains.

Quality, Products and Materials

Vita Partners is committed to utilising quality products and materials to create the best places.

Suppliers are expected to:

- ensure all products and materials used in Vita Partners projects and assets meet all applicable laws and standards and comply with the manufacturers' specifications for testing and installation;
- adopt a systematic approach to product integrity, ensuring specified products are not substituted without relevant written approvals, meeting specific quality requirements and minimising the risks of nonconforming work;
- take reasonable steps to conduct due diligence on products containing 'conflict minerals' (including tantalum, tin, tungsten and gold) and strive to verify sourcing from legitimate, conflict-free mines; and
- produce, upon reasonable request, evidence of all required certifications and traceability of products utilised.

Anti Money Laundering and Counter of Proliferation Financing & Terrorism Financing

Vita Partners is committed to ensuring compliance with anti-corruption and anti-trust laws.

Suppliers are expected to:

- not attempt to bias a decision or gain a business or commercial advantage for Vita Partners' benefit, directly or indirectly, by promising, giving, requesting or agreeing to receive or accept bribes or facilitation payments including a kickback, favour, cash, gratuity, inappropriate level of entertainment or anything of an inappropriate value;
- not offer, promise or give to any Vita Partners employee a kickback, favour, cash, gratuity, inappropriate level of entertainment, or anything of an inappropriate value with the purpose of obtaining favourable treatment from Vita Partners;
- preserve and promote free competition in all undertakings, and not conceal or fail to report any indication of improper payments;
- not engage in anti-competitive practices such as price fixing schemes, misleading or deceptive conduct, misuse of market power or bid rigging arrangements; and
- take reasonable steps to have appropriate policies and procedures in place designed to prevent corruption, bribery or anti-competitive behaviour, including insider trading, money laundering, proliferation financing and terrorism financing.

Data Protection, Privacy, Confidentiality and Cyber Security

Vita Partners collects, uses, discloses and retains personal information and commercial in confidence information (Vita Partners Sensitive Information) to the extent necessary to meet its business requirements, and as permitted by law and contractual arrangements in the jurisdictions in which we operate.

Suppliers are expected to:

- use reasonable safeguards to protect Vita Partners Sensitive Information against loss, theft, destruction or unauthorised access, use, alteration or disclosure;
- ensure appropriate cyber security measures is legally required or necessary to perform their obligations to Vita Partners;
- within their information assets and resources to appropriately manage the risk of internal and external cyber threats;
- unless otherwise agreed with Vita Partners, not retain Vita Partners Sensitive Information for longer than the prescribed statutory limits or contractual stipulations;
- not access or use Vita Partners Sensitive Information other than for the legitimate purpose for which it was collected, or, in accordance with a contractual obligation owed to Vita Partners; and

- inform Vita Partners of and cooperate with Vita Partners in relation to any data breach or incident that may impact Vita Partners Sensitive Information.

Supplier Diversity and Community Investment

Vita Partners works with communities to foster economic prosperity and social inclusion in the places it operates in. Where opportunities present, Vita Partners supports Supplier diversity through engagement with a variety of suppliers including minority owned businesses, social enterprises and local businesses in the communities in which we operate.

Suppliers are expected to:

- respect the traditions, cultures and laws of the countries and communities in which we operate;
- where appropriate and practicable, share our commitment in supporting programs and initiatives that encourage supplier diversity and community involvement;
- where appropriate and practicable, keep records of resources and time spent delivering community benefit and social value activities in conjunction with Vita Partners and, on reasonable request, provide this data to Vita Partners.

Raising a concern

If a Supplier becomes aware of a circumstance or action that contravenes, or appears to contravene, this Supplier Code of Conduct or the Vita Partners Code of Conduct, they can lodge a confidential report via WhistleB <https://report.whistleb.com/en/vitagrowthpartners>.