
Supplier Code of Conduct

GPT recognises the responsibility that we share with our suppliers to operate ethically. The Supplier Code of Conduct (SCOC) outlines GPT's fundamental expectations of its suppliers regarding their activities in the production and delivery of goods and services supplied to GPT. The Supplier Code of Conduct supports GPT's values, purpose and strategy and commitment to open and transparent relationships with our suppliers, as well as internationally recognised standards and appropriate codes of practice.

By accepting and abiding by this SCOC, suppliers affirm that they are committed to working with GPT and are aligned to its values, purpose and strategy. It is the supplier's responsibility to achieve and maintain the minimum standards outlined in this SCOC, and train employees and contracted parties on their consequential rights and responsibilities.

The SCOC covers People, Environment, Community, Corporate Governance and Supply Chain. GPT will continue to evaluate suppliers on capability and commercial acumen, while taking into consideration compliance to the Supplier Code of Conduct. We will monitor supplier compliance through our Supplier Pre-qualification Survey, our supplier management systems and share tools and resources to encourage continuous improvement of our suppliers.

1. Scope

This SCOC applies to all suppliers of goods and services to GPT, whether local, national or international.

2. Definitions

In this SCOC, unless the context otherwise indicates, Suppliers means organisations that provide goods or services to GPT and are under contract via a Purchase Order, Specialist Service Agreement, Professional Services Agreement, Consultant Deed, Master Supply Agreement, Design & Construction Contract, Construct Only Contract or a suppliers Service Agreement. They are organisations that GPT aspires to align with GPT's values, purpose and strategy.

3. Human Rights

Human rights are rights inherent to all human beings, regardless of race, gender, sexual preference, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

4. Compliance

All suppliers of GPT must comply with all laws and regulations relevant to their business. This includes but is not limited to;

- complying with all laws and regulations on bribery, corruption, anti-competitiveness and prohibited trade and business practices.
- complying with applicable anti-corruption and anti-competitiveness laws.
- complying with all relevant local and national laws and regulations with regard to employment practices, benefits, health and safety and anti-discrimination practices.

Complying with all relevant local and national laws and regulations regarding work, health and safety, and the provision of health related benefits to employees.

5. People

GPT is committed to creating diverse, inclusive and safe workplaces, and providing equal opportunity in all aspects of employment. We believe that the unique skills, perspectives and experience that our employees possess promote greater creativity and innovation that better reflect and serve the needs of our diverse customer base, leading to improved business performance.

5.1 Human Rights & Modern Slavery

The GPT Group is committed to creating and supporting a culture and work environment in which all people are treated with respect, and have equal opportunities to do their best work. Suppliers to GPT are expected to:

- provide a workplace free of any form of harassment with a focus, and proactive management of, fair treatment and equality of opportunity.
- not use any form of forced, bonded, indentured or prison labour. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice.
- pay wages and benefits that must satisfy at a minimum legislation requirements in Australian jurisdictions. Working conditions must be to national legal standards that include working hours that are not excessive, physical and mental demands of the workplace are appropriate and workers must enjoy the right to association and collective bargaining
- not engage in any forms of child labour. Child labour refers to work that is mentally, physically, socially or morally harmful to children which prohibits educational or social development by depriving the opportunity to attend school, by obliging them to leave school prematurely, or by requiring them to attempt to combine school attendance with excessively and/or long and heavy work.
- describe their steps taken to eradicate modern slavery within their business.
- train their staff on all areas of modern slavery, including their rights and obligations of employment.
- hold their supply chain to account, and implement appropriate due diligence processes, to eradicate the potential for, and identify instances of modern slavery.

- strive to support the principles in the UN Global Compact Principles.
- establish effective grievance and remediation procedures to ensure that anyone working within their business or supply chain can submit a grievance and have the grievance professionally responded to without suffering any prejudice or retaliation of any kind.

5.2 Diversity & Inclusion

The GPT Group is committed to encouraging diversity in the workplace and the provision of a work environment that is free from discrimination and promotes equal opportunity to all. Suppliers are expected to:

- promote an inclusive workplace where employee differences in areas including sexual orientation, sex, gender identity, race, beliefs, age or abilities are valued.
- provide a workplace that is free of direct or indirect discrimination, harassment or bullying e.g. no discrimination in hiring, compensation, access to training, promotion, termination or retirement.
- have effective grievance and remediation mechanisms for concerns to be freely raised and effectively and consistently addressed.

base decisions relating to suppliers, customers, contractors and other stakeholders on merit or other non-discriminatory considerations

5.3 Learning & Development

The GPT Group is committed to supporting the career development of its employees through continuous learning, by providing opportunities to develop skills and experiences, assisting them to achieve their career goals. Suppliers are expected to:

- commit to the provision of relevant training, learning and development opportunities for all of their employees.
- commit to the provision of mandatory training for all of their employees to ensure they appropriately skilled to provide services to GPT.

5.4 Workplace Health & Safety

The GPT Group is committed to a zero harm approach for the health and safety of our employees, contractors, tenants and visitors to our assets. GPT expects all employees, contractors, tenants and visitors to our sites to be treated fairly and with respect.

Suppliers must support and demonstrate their commitment to:

- a safety culture aligned to that of GPT.
- having safe and healthy working facilities and appropriate precautionary measures to protect employees from work-related hazards and potential dangers in the workplace.
- Providing a safe, healthy, collaborative and productive working environment, including having measures in place to prevent employees from engaging any unreasonable behaviour that discriminates, bullies, victimises, humiliates, undermines or threatens another person or would reasonably be expected to do so.

- preventing anyone at our assets being exposed to potential safety hazards.
- having documented safety and health policies and standards, with processes in place to monitor the implementation of these policies.
- providing employees regular health and safety training; and
- having a documented system to record, investigate and reduce work-related injury and illness.

5.5 Wellbeing & Employee Assistance Programs

The GPT Group recognises the importance of Health and Wellbeing. GPT acknowledge the wonderful diversity of our workforce and taking account of the uniqueness of what wellness means to each of us.

Suppliers are to support and demonstrate their commitment to:

- becoming an Employer of Choice within their relevant industry.
- fostering an environment where employees feel comfortable with asking for, and have access to, assistance tools and programs.

providing support systems to encourage general physical and mental well-being.

6. Environment

Suppliers are to manage the minimisation of their environmental impact in the course of doing business, and to support and encourage others where it can meaningfully do so. They should work towards the adoption of best practice environmental principles and practices.

All required environmental permits and registrations are to be obtained, maintained and kept current.

6.1 Climate Change

The GPT Group aspires to identify and respond to climate change risks and opportunities in managing our assets and work towards carbon neutrality in our operations, development and business activities. Suppliers are expected to:

- commit to reduce their carbon emissions in areas within their control at their own and at GPT assets, and to imbed a preference for carbon neutral products and services in their supply chain.

assist The GPT Group in mitigation and adaptation related to the impacts of climate change, and driving changes to a low carbon economy.

7. Energy Management

The GPT Group will optimise energy efficiency, transition to renewables and support an orderly and resilient transition to a low carbon energy future. Suppliers are expected to:

- commit to measuring and reporting energy consumption (both quantity and type) with regards to products and services provided to GPT.
- align with GPT's goals to transition to a low carbon economy.

7.1 Waste & Material Management

The GPT Group aspires to utilise materials optimally for maximum lifecycle and disposal or recycling of waste (gas, liquid or solid waste) without environmental harm. Suppliers are expected to:

- actively participate in schemes and initiatives for reduction and efficiency such as NABERS and other regulative requirements or asset strategies
- commit to utilising resources optimally for maximum lifecycle with a preference for a closed loop approach, and to only use what is needed.

Commit to measuring and reporting material use and waste (both quantity and type) with regards to products and services provided to GPT.

7.2 Biodiversity

The GPT Group aspires to positively contribute to sustainable and resilient communities and ecosystems through the protection of biodiversity. Suppliers are expected to:

- actively avoid and mitigate biodiversity dependencies and impacts in accord with regulatory requirements, regional and/or local planning schemes, and asset strategies.
- commit to measuring and reporting chemical use (both quantity and type) with regards to products and services provided to GPT.

align with GPT's goals toward becoming Nature Positive.

7.3 Water

The GPT Group aspires to employ best practice approaches to sustainable use and management of water resources. Suppliers are expected to:

- commit to sustainable use and management of water resources in all areas that it has control over, and to support and encourage others where it can meaningfully do so;
- commit to measuring and reporting water use and waste (both quantity and type) with regards to products and services provided to GPT; and

proactively assisting GPT in identifying, rectifying, and preventing losses caused by inefficient equipment or operational practices.

7.4 Product certification

The GPT Group recognises the importance of purchasing ethically source products. GPT use a range of product certification schemes, a proactive initiative which provides standardised certification, training and professional standards for social compliance auditors globally. Suppliers are expected to:

commit to purchasing ethically sources product which are approved by a standardised certification scheme such as Good Environmental Choice Australia Certification (GECA), Forest Stewardship Council (FSC), Program for the Endorsement of Forest Certification (PEFC) Certification and GreenTag Certification

8. Community Engagement & Development

The GPT Group aims to make a net positive contribution to our communities, people and environment. Suppliers are expected to:

- commit to contribute to the local communities with which the supplier interacts, and to support their sustainable development.
- support GPT's commitment to Reconciliation with First Nation's Peoples, for example through the adoption of a Reconciliation Action Plan that best suits their business.

9. Social Procurement

Social procurement leverages an organisation's buying power to deliver social value, above and beyond the

value of the goods or services being procured. It builds diversity into the supply chain and creates job opportunities for under-represented groups, reinvigorating marginalised communities.

GPT has committed to applying a positive incentive as part of the procurement selection process for all suppliers with the following diversity included in their workforce:

- Youth employment schemes
- Disadvantaged youth employment schemes
- Mature age worker employment
- Long term unemployment
- Work experience opportunity
- People with a disability
- Migrant workers
- Gender balance and equality
- First Nation workers

Suppliers are expected to support GPT's commitment to social procurement that best suits their business.

10. Corporate Governance, Business Conduct and Ethics

The GPT Group regards good corporate governance as being of critical importance to all of GPT's stakeholders and a fundamental component of GPT's commitment to its security holders. GPT's Board strives to ensure that GPT meets high standards of governance across its operations. Suppliers are expected to:

- conduct their business in accordance with the highest ethical standards.
- have effective and transparent allocation of responsibilities between Board and management, where an applicable management structure exists.
- have effective processes in place to prevent or immediately disclose a conflict of interest or the perception of a conflict of interest related to its relationship with GPT as soon as possible to GPT, and
- advise GPT in the event of any failure of the supplier to conduct themselves to the highest ethical standards

11. Supply Chain

The GPT Group is committed to working in partnership with our suppliers to realise the full value of our relationships and to positively contribute to our stakeholder communities and the environment. Suppliers are expected to:

- adopt similar principles to those outlined in this SCOC in dealing with their own suppliers.

adhere to acceptable business practices with their own suppliers, including providing timely payment within agreed terms.

12. Cyber Security and Privacy

The GPT Group recognise the necessity to adapt to the rapidly changing cyber environment and threat landscape which requires the maintenance of an information security system and relevant controls that are no less rigorous than accepted industry standards to protect any Personal Information and Confidential Information obtained in the course of acquiring services, from unauthorized access, disclosure or misuse. Suppliers are expected to:

- complete GPT's Third Party Cyber Security Assessment and where GPT indicates a higher level of risk, develop a Cyber Security Management Plan.
- immediately notify GPT after becoming aware of a Security Incident and comply with all directions issued by GPT in connection with the Security Incident. (For further information refer to the Security System clause in all GPT Agreements)
- ensure all agreements and other supply chain arrangements the supplier enters into and which may allow or cause access to GPT assets and data are governed by the Cyber Security Management Plan;
- immediately notify GPT (including providing full details) of a Privacy Incident (For further information refer to the Privacy clause in all GPT Agreements)

13. Management and Reporting of Information

Suppliers must make available upon request any compliance, governance or sustainability performance information, data or reports which may be required by GPT. These may include copies of certificates, accreditations and other product information.

14. Reporting Concerns

The standards of conduct described in these guidelines are critical to the ongoing success of GPT. If you have any concerns about compliance or ethics issues while working for or with GPT or want to report illegal or unethical activities:

Email: whistleblowerprogram@gpt.com.au

Post: Marked "Strictly Private and Confidential" GPT Whistleblower

All matters raised in good faith through these reporting lines will be handled in a confidential and non-retaliatory basis

15. Review of Policy

We will review this Policy periodically and may modify and update it at any time. Changes to this Policy will come into effect immediately upon such changes being uploaded on our website, so we encourage you to check this policy from time to time.

16. Related Policies, procedures and guidelines

- Biodiversity Policy
- Water Policy
- Energy Policy
- Climate Change Policy
- Code of Conduct Policy
- Conflict Management Policy
- Health & Safety Policy
- Privacy Policy
- Supplier Policy
- Sustainability Policy
- Materials and Waste Management Policy
- Whistleblower Policy
- United Nations Global Compact and its 10 principles on human rights, labour, the environment and anti-corruption.

17. Document control

Version	Document Owner	Author	Description	Document Approver	Approval / Revision Date
1.0	Head of Procurement	Chris Errington	Original Version	COO	June 2020
2.0	Head of Procurement	Andrew Milligan	Modern Slavery update	CFO	May 2023
2.1	Head of Procurement	Andrew Milligan	Clause 5.4 updated	CFO	Dec 2023
2.2	Head of Procurement	Andrew Milligan	Clause 4 and 5.1 updated to reflect anti-competitiveness and collective bargaining	CFO	May 2024