



Supplier Code of Conduct

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1. Background

Region comprises Region Management Trust, Region Retail Trust (together, Trusts), Region RE Limited (“**Region RE**”) and any entities owned and / or managed, either beneficially or legally, by the Trusts or Region RE (“**Region**”).

2. Purpose

Region is committed to conducting business in an ethical, legal and socially responsible manner. Region expects its suppliers to support this commitment and, therefore, has established this Supplier Code of Conduct (“**Supplier Code**”). All Region suppliers shall meet the following minimum requirements in the areas of compliance with laws, environmental practices, health and safety practices, human rights and labour practices and ethical business conduct in order to do business with Region.

2.1 Compliance with Law

Suppliers with whom Region chooses to conduct business are expected to obey the laws and regulations of the jurisdictions in which they are domiciled when providing services to Region.

2.2 Environmental Practices

All suppliers to Region shall comply with all environmental laws and regulations applicable to their operations worldwide. Such compliance shall include, but is not limited to, the following items:

- (a) obtaining and maintaining environmental permits and timely filing of required reports;
- (b) proper handling and disposal of hazardous materials; and
- (c) monitoring, controlling and treating discharges generated from operations.

2.3 Workplace Health and Safety Practices

All suppliers to Region are expected to provide their employees with a safe and healthy working environment in order to prevent accidents and injury and minimise exposure to health risks. Suppliers shall comply with the health and safety laws and regulations in the jurisdictions in which they operate and provide, though not limited to, the following:

- (a) clean and safe facilities;
- (b) occupational health and safety training;
- (c) a system for injury and illness reporting; and
- (d) protective measures to prevent injuries/illnesses to workers.

Region is committed to maintaining a safe and healthy working environment. Suppliers must ensure that they, and their employees and subcontractors, treat Region’s employees, contractors, tenants and members of the public visiting Region’s shopping centres with respect and courtesy. Region has zero tolerance for abusive, threatening or belittling behaviour.

2.4 Human Rights and Labour Practices

All suppliers to Region are expected to adopt sound labour practices and treat their workers fairly in accordance with applicable laws and regulations.

In addition, suppliers must comply with the following standards:

- (a) Freely Chosen Employment – Suppliers shall not use any forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. Each supplier shall:
 - (i) refrain from engaging in any acts of “modern slavery” as this term is defined, inter alia, in Section 4 of the *Modern Slavery Act* (2018), as such act

may from time to time be amended (the “**Modern Slavery Act**”); and

- (ii) take commercially reasonable steps to ensure that its subcontractors and suppliers do not engage in any such acts, regardless of whether such supplier or its subcontractors or suppliers are subject to the Modern Slavery Act.

- (b) No Child Labour – Suppliers shall comply with the minimum working age laws and requirements in the relevant jurisdiction and shall not undertake any practices that comprise the worst forms of child labour¹.
- (c) Minimum Wages – Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements of the relevant jurisdiction.
- (d) Working Hours – Suppliers shall not require workers to work more than the maximum hours of daily labour set by the laws in the relevant jurisdiction.
- (e) No Harsh, Inhumane Treatment or Abuse – Suppliers shall treat each employee with dignity and respect. In no event shall supplier’s workers be subjected to threats of violence, physical punishment, confinement or any other form of physical, sexual, psychological or verbal harassment or abuse.
- (f) Anti-discrimination – Suppliers must comply with all relevant laws in their jurisdiction in relation to anti-discrimination.
- (g) Freedom of Association – Suppliers shall recognise and respect the rights of their

workers to associate with labour unions in accordance with the labour laws and established practices in the relevant jurisdiction.

2.5 Environmental Standards

Suppliers should maintain an environmental management system that identifies and manages environmental impacts.

2.6 Anti-Fraud, Anti-Bribery & Anti-Corruption Policy

All suppliers to Region are to adhere to Region’s Anti-Fraud, Anti-Bribery & Anti-Corruption Policy (“Policy”).

The Policy is available at:

<https://regiongroup.au/about-us/corporate-governance/>

2.7 Ethical Business Conduct

All suppliers to Region are expected to conduct their businesses ethically and in accordance with the law.

2.8 Acknowledgement, Monitoring and Compliance

- (a) Suppliers acknowledge receipt of this Supplier Code. Lack of adherence to the Supplier Code will be addressed with suppliers by Region’s nominated officer during the supplier evaluation and via the supplier management process, if necessary.
- (b) All suppliers to Region shall monitor their activities to ensure their compliance with this

¹ As defined in Article 3 of the International Labour Organisation Convention (No 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour

Supplier Code and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier agrees to notify the Responsible Person² as to its plans to remedy any such non-compliance. Without limiting the foregoing, in the event that a supplier becomes aware of any acts of slavery or human trafficking by it or any of its subcontractors or suppliers, it shall promptly notify Region in writing and reasonably cooperate in any related Region investigation thereof.

- (c) Region may request additional information from suppliers regarding their compliance efforts and/or engage in additional monitoring activities to confirm supplier's compliance to this Supplier Code, including on-site inspections of facilities, use of questionnaires, review of publicly available information or other measures necessary to assess supplier's performance. Any Region employee that becomes aware of violations of this Policy shall notify the Responsible Person for review and appropriate action. Based on the assessment of information made available to the Responsible Person, Region reserves the right (in addition to all other legal and contractual rights) to disqualify any potential supplier from participation in the bidding process and/or terminate any relationship with any current supplier found to be in violation of this Supplier Code without liability to Region.

² The Responsible Person means the individual named by Region to be responsible for and to have control and oversight of the services offered or rendered by a supplier to Region (refer to Region's Outsourcing Policy for further information)