

Suppliers Code of Conduct

Grosvenor Engineering Group

March 2019

Grosvenor views its suppliers as partners

This Supplier Code of Contact sets out the minimum standards of behaviour that Grosvenor expects its suppliers to meet in the areas of labour and human rights, non-discrimination, bullying, harassment and discrimination, wages, benefits, working hours, workplace health and safety, environment, business integrity, privacy and supplier diversity.

About our business

Grosvenor is passionate about bringing smarter buildings to life and creating long-term sustainable value for building owners, managers and their occupants.

An Australian-owned company established in 1994, we have grown to become a leading building services provider with over \$2.2 billion of assets under management across 16,800 sites nationwide. With a proven history of delivering real business outcomes to buildings by making them safer, more comfortable, productive and energy efficient – at the lowest possible cost. Grosvenor has developed a powerful asset maintenance and lifecycle management ecosystem. Our key differentiator is that we don't just service assets, we study them, to find ways to reduce total asset lifecycle cost. Not only does this have less impact on the environment, it's better for the bottom line too.

Grosvenor has a national supply chain with suppliers from the following sectors: Information, communications, and technology; property services (including facility management, utilities, cleaning, waste management and security); logistics and correspondence; consulting services; marketing, print and promotional goods and services; fleet management; office supplies and corporate clothing.

Introduction

In alignment with our corporate values, Grosvenor is committed to promoting ethical, environmental and social standards throughout our supply chain, which include suppliers, contractors, sub-contractors and consultants. This Supplier Code of Conduct provides a set of guiding principles and clearly communicates Grosvenor's expectations of our suppliers to help us make the right decisions every time. These principles operate in conjunction with our values and our need for a safe, fair and sustainable working environment, including those relating to human rights.

Grosvenor expects our suppliers to read, understand and ensure that their business and supply chain meet these principles.

Corporate Governance and ethics

Strong corporate governance and ethical behaviour are central to Grosvenor's approach to business. Suppliers must comply with all applicable laws, standards and regulations on bribery, corruptions and prohibited business practises in the countries where they operate. Suppliers must conduct business in an ethical, equitable, transparent, trustworthy and professional manner in all their dealings.

Suppliers must disclose any part of their business operations that may not meet reasonable Australian community standards of ethics and business practices.

Labour and human rights

Grosvenor respects human rights as set out in the International Bill of Human Rights and principles of the UN Global Compact. We expect our suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

We do not tolerate child labour in our supply chain and expect our suppliers to ensure compliance with relevant laws affecting forced or involuntary labour. We expect our suppliers to comply with relevant laws and regulations in relation to employment practices, wages and benefits, working conditions and equal opportunity. Suppliers must not use deductions of wages as a disciplinary measure and must pay workers as required by law.

We do not tolerate slavery, servitude and human trafficking in our supply chain. Suppliers must not require workers to surrender any government issued identification, passport or work permits or other personal document as a condition of employment.

Non-discrimination

Grosvenor is committed to providing an environment in which employees have equal access to opportunities available at work. Suppliers must not engage in or support discriminations in hiring and employment practises, including on the grounds of: Age; Gender; Ethnic Origin; Religious beliefs or practises; Race; Cultural background; Marital relationship status; Disability; Physical appearance; Sexual orientation; Gender identity and expression; Pregnancy or potential pregnancy; or Parental status.

Suppliers must ensure that their employees are not harassed in any way and encourage a culture of respect and inclusion.

Bullying, Harassment and Disciplinary Practices

Suppliers must provide a workplace that is free of direct and indirect discrimination, harassment and bullying. Suppliers must not use violence, threats of violence or other forms of physical correction, corporal punishment or torture. Mental or verbal abuse, sexual harassment or sexual abuse of employees, or the threat of any such treatments is prohibited.

Suppliers must promote a “Zero” tolerance of unlawful harassment.

Wages and Benefits, Working Hours

Suppliers must provide fair pay and working conditions for employees including adequate rest periods, Leave, minimum wage requirements and must not require workers to exceed prevailing local work hours. Compensation paid to employees will comply with applicable national wage laws. Suppliers must pay employees in a timely manner and aim at providing an adequate standard of living for employees and their families.

Workplace Health and Safety

Grosvenor is committed to promote a culture of health and safety awareness and practices to ensure risks in the workplace are identified, assessed and eliminated or controlled.

Suppliers must identify and comply with all legal responsibilities under applicable legislation of the countries in which they operate. Suppliers must ensure that their workers understand and follow health and safety policies and procedures that apply to their work.

Suppliers must provide a safe and clean environment for employees and take reasonable steps to identify workplace hazards and minimize the risk to workplace injury, illness or disease for workers.

Suppliers must obtain, maintain and keep up-to-date all permits, licenses and registrations required for works carried out in accordance to local law and provide appropriate training to workers to perform their job safely.

Safety information relating to hazardous materials shall be available to educate, train and protect workers from hazards. A safe and healthy working environment also includes as a minimum: Portable drinking water; Adequate lighting, temperature and ventilation; Clean toilet facilities and personal protective equipment.

Suppliers must support workers to raise health and safety issues or concerns without the fear of disciplinary actions, dismissal or discrimination.

Suppliers must have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies.

Environment Considerations

Suppliers are expected to comply with all relevant local and national laws and regulations relating to the environment. Suppliers are expected to have a documented environment

management policy and set targets to reduce material environmental impacts. Suppliers are expected to provide transparent and public reporting on material environmental performance.

Suppliers must identify, monitor and seek ways to maximize efficient use of energy consumptions, water, resources and raw materials from their own operations. Suppliers must also seek ways to minimise greenhouse gas (GHG) emissions.

Risk Management

Suppliers are expected to have a risk management framework which incorporates social, ethical, safety and environmental risks into their risk management processes. We encourage our partners to have established a business continuity plan to minimise business impacts in the event of major disruptions, including an emergency response plan to minimise harm to employees, the local community and environment in the event of a site disaster.

Suppliers are expected to have appropriate information, security policies and procedures in place for secure access to our information.

Freedom of Association and Collective Bargaining

Suppliers are expected to ensure that rights in connection with freedom of association and collective bargaining are respected. Workers without discrimination have the right to join or form trade unions of their own choosing and to bargain collectively. The employer should adopt an open attitude towards the activities of trade unions and their organisational activities.

Workers representatives are not to be discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under relevant laws, the employer facilitates, and does not hinder, the development of equivalent means for independent and free associations and bargaining.

Community

Grosvenor contributes to community development through several initiatives, including sponsorships, employee giving and strategic partnerships with charitable organisations. Grosvenor does not establish specific supplier expectations in relations to community activities however prefers that its suppliers share similar values in relations to community contribution and can demonstrate tangible initiatives in support of community development.

Supply Chain

Grosvenor embraces a strong belief in the advantages of sustainable procurement and aims to collaborate with its suppliers to minimise adverse social, economic and environmental effects of activities occurring along its supply chain. Grosvenor is committed to helping our suppliers comply with the code and in turn, expect our suppliers to require their own suppliers to comply with similar principles to those outlined in this code of conduct.

For further information, please refer to the Grosvenor Procurement team.