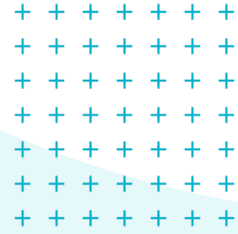




campus living
villages



RESPONSIBLE SOURCING POLICY & SUPPLIER CODE OF CONDUCT

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1. OUR COMMITMENT

Campus Living Villages (CLV) is committed to sustainable business practices across our operations and supply chain. We recognise that the actions of our suppliers, and our interactions with them, support our efforts to drive positive social, environmental and economic outcomes beyond our own operations.

Our approach to responsible sourcing guides our purchasing decisions and ensures our supplier relationships help us mitigate environmental, social and governance risks and potential negative impacts in our supply chain. Finding reliable suppliers prepared to work in partnership with us is important for business success.

This Responsible Sourcing Policy and Supplier Code of Conduct forms part of our approach and applies to businesses that provide products and/or services to CLV. The purpose is to:

- share our values and the strategic priorities of our Sustainability Strategy
- set expectations of our suppliers in providing goods and services to CLV.

One of five strategic priorities in our Sustainability Strategy is to **foster trusted partnerships to deliver mutually beneficial outcomes**. CLV seeks to conduct business with suppliers that share our values and support our commitments to operate in an ethical, socially and environmentally responsible manner. Our goal is to build relationships and collaborate openly with suppliers to maximise the positive and mitigate the negative impacts of our purchasing decisions.

Suppliers should inform CLV by emailing sustainability@clv.com.au if they are unable to meet these expectations and we may endeavour to work alongside and collaborate with you to improve your ability to meet these requirements.

By accepting and abiding by this Responsible Sourcing Policy and Supplier Code of Conduct, you are affirming that your company is committed to working with CLV and are aligned to our values and strategic priorities. It is the supplier's responsibility to achieve and maintain the minimum standards outlined in this document and to engage employees and other contracted parties on their consequential rights and responsibilities.

2. OUR VALUES

Care: We care about what we do and about our role in our communities.

Accountability: We are each responsible for our words, actions, decisions, and results.

Integrity: We are open, honest, and do the right thing.

Teamwork: We work together collaboratively and respect everyone.



3. OUR STRATEGIC PRIORITIES AND EXPECTATIONS

Build the resilience of our business

Corporate governance

Corporate governance is the framework of systems, policies and processes by which we operate, make decisions and hold people to account.

Our approach to corporate governance is based on a set of values and behaviours that underpin our day-to-day activities, and work to promote transparency, fair and lawful dealing and the protection of stakeholder interests.

Our corporate governance structure is critical to managing and mitigating our impacts.

Expectations

Suppliers must:

- Comply with all applicable local, national and international laws and regulations, including in relation to bribery and corruption and ethical conduct.
- Act ethically and transparently, avoid and disclose actual, potential or perceived conflicts of interest with CLV in their dealings, and have a policy or statement which commits employees to ethical conduct, standards and behaviours.
- Have a zero-tolerance approach to fraud, bribery and corruption with supporting mechanisms in place for reporting of unethical behaviour.

We encourage suppliers to:

- Establish and maintain a channel for employees and stakeholders to confidentially and anonymously raise complaints and a process for investigating and remedying complaints which ensures no retaliation.
- Take an industry leadership role by adhering to all relevant industry, product and service standards.

Risk Management

Our approach to responsible sourcing takes a risk-based approach. Our engagements with suppliers throughout the lifecycle of our partnerships may include activities that seek to identify, assess, mitigate and monitor the environmental, social and governance related impacts of our purchasing decisions. .

Expectations

Suppliers must:

- Identify, mitigate and manage their risks, vulnerabilities and compliance obligations.
- Protect CLV's business and customer information, and handle any information shared with their business in accordance with contractual and regulatory requirements.

We encourage suppliers to:

- Share information with us upon request on material sustainability impacts and risks. This may include internal and/or external targets, key performance metrics and reports.
- Continuously improve their performance in relation to management of environment, social and governance issues.
- Validate environmental and social (including safety) performance using credible and independent third parties.
- Maintain a business continuity plan to minimise disruption to the business and its employees, customers and stakeholders and impacts on the community.



Develop our people and support their wellbeing and deliver a vibrant resident experience based on care

Health and safety and wellbeing

CLV seeks to provide environments both in our workplaces and our villages that support the wellbeing of our employees and our residents.

Our CLV Cares framework is our proactive, prevention-based approach to wellbeing:

- Access: partner with organisations that support wellbeing
- Awareness: raise awareness of available wellbeing resources and services
- Culture: create and maintain a culture focused on wellbeing
- Belonging: maintain an inclusive and engaged community
- Communication: provide pathways for wellbeing-related concerns to be raised
- Spaces: provide access to physical spaces that support wellbeing.

Expectations

Suppliers must:

- Comply with relevant local and national laws and regulations on work, health and safety management and reporting.
- Maintain the health and safety of their direct and indirect employees, customers and stakeholders.
- Have a documented health and safety statement or policy in place and a system to record, monitor and manage hazards and risks to safety and for the effective management of incidents and events.

We encourage suppliers to:

- Build proactive, prevention-based wellbeing practices into their workplace culture and health and safety programs.

Human Rights

CLV recognises that we have a responsibility to respect human rights, and the opportunity to positively impact human rights through our value chain.

Our approach is underpinned by a commitment to respect human rights as set out in the:

- International Bill of Human Rights which comprises the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- ILO Declaration on Fundamental Principles and Rights at Work.

And to support the:

- United Nations Guiding Principles on Business and Human Rights.

Where we identify issues of concern, we will seek to better understand suppliers' processes and practices and work with them to resolve and improve these. However, tolerance for inaction, concealment or retaliation against workers is zero.

Expectations

Suppliers must:

- Respect internationally recognised human rights through their operations and business relationships, including their supply chain, and endeavour to address any adverse human rights impacts.
- Ensure all workers, whether directly employed or not, are legally entitled to work, are provided with legally required wages and entitlements, fair working conditions and their rights to freedom of association and collective bargaining are respected.
- Ensure they have policies and/or processes in place to identify, mitigate and address any form of modern slavery within their operations and supply chain, including human trafficking, slavery, servitude, forced labour, bonded labour, deceptive recruitment, forced marriage and the worst forms of child labour. If these policies or processes are not in place, suppliers must be willing to engage with CLV to address risks.



- Comply with all applicable laws, regulations and international standards relating to the direct or indirect employment of children and ensure these are abided by in subcontracting relationships. It is recommended suppliers set clear expectations of their supply chains regarding the prohibition of child/underage labour and children performing hazardous work.
- Promptly notify us if they become aware of any actual or suspected modern slavery risks or incidents within their operations or supply chains. This includes risks identified through audits, worker complaints, whistle-blower or third-party assessments. Suppliers must cooperate fully with any review or investigation we undertake.

Inclusion and equity

CLV seeks to foster inclusive workplaces where every individual can participate and develop.

We are committed to setting and embedding practices in our workplaces that value and promote inclusivity. Additionally, we have policies and systems in place to report grievances that seek to protect employees, residents and suppliers from harassment, bullying and victimisation.

We are also committed to increasing opportunities in our supply chain for businesses that are owned by or that employ underrepresented groups or that have a social mission. We focus on fostering partnerships with:

- First Nations owned businesses
- Disability enterprises
- Social enterprises
- B Corporations

Expectations

Suppliers must:

- Treat all employees fairly, ethically, respectfully and with dignity and have protections against direct and indirect discrimination, bullying and harassment.

We encourage suppliers to:

- Create a workplace environment that promotes inclusion, accessibility, flexibility and wellbeing.
- Create opportunities for a diversity of suppliers within their supply chains.
- Build partnerships within the communities in which they operate to support local economies.

Minimise our environmental footprint

Environmental management and climate risk

CLV is committed to managing our environmental impacts, risks and opportunities. We recognise our ability to influence positive environmental change, to help find solutions to environmental challenges and minimise our direct and indirect footprint.

CLV recognises that climate change is one of the most significant issues that will impact the long-term prosperity of the global economy and our way of life. Addressing climate change requires collective action, engagement and collaboration with a range of stakeholders, including our supply chain.

Expectations

Suppliers must:

- Comply with all applicable local and national laws and regulations on environmental management and reporting, including disclosure of any breach of licence requirements.

We encourage suppliers to:

- Measure, monitor, minimise and report material environmental impacts associated with their products and services, and from their operational footprint.
- Collaborate with us in managing climate-related risk and support our goals to reduce supply chain emissions.
- Provide their greenhouse gas emissions data to us for inclusion within our scope 3 inventory.
- Take a leadership role in environmental issues faced by the business and its industry sector.
- Drive innovation, practise circular economy principles and promote product stewardship for their goods.



4. IMPLEMENTATION

CLV may undertake screening, due diligence and assessments of its suppliers to determine levels of sustainability-related risk and performance. This may include suppliers completing an assessment, which provides CLV with information required for onboarding, governance, monitoring and reporting obligations throughout the lifecycle of the relationship.

Suppliers are required to comply with CLV's screening and due diligence processes and are expected to respond with transparency and honesty, providing reasonable access to relevant documentation and acting promptly on issues identified.

Suppliers must notify CLV of any actual or suspected instances of non-compliance with this Code within their operations or supply chain. Notification needs to include the steps the supplier is taking to investigate and address the issue and the proposed timeframe.

Suppliers should also be aware that CLV's Fair and Transparent Business Practices Policy (FTBP) applies to contractors, consultants, agents, and intermediaries who are engaged to act for and on behalf of CLV (collectively referred to as 'Associated Persons'). Where a supplier engages with CLV in a capacity that brings them within the scope of Associated Persons, both this Code and the FTBP Policy apply.

Our goal is to collaborate and partner with our suppliers to help them to meet the requirements of this Code.

5. SPEAKING UP

CLV is committed to conducting our business with honesty, fairness and integrity. CLV encourages our suppliers and sub-contractors to speak up where they suspect wrongdoing within any relationship with CLV or have a concern about the conduct of any of our representatives in our operations or supply chain.

CLV is committed to protecting anyone reporting wrongdoing. If suppliers, including their current or former employees, have knowledge of, or reason to suspect any reportable conduct which involves CLV, we encourage them to report it as soon as possible through our dedicated whistleblowing channels.

Our Speak Up reporting system can be accessed via <https://campus-living-villages.integrityline.com>

By signing below you confirm you have read this Supplier Code of Conduct and agree to abide by it.

Company Name:

Representative Name:

Representative Title:

Signature:

Date: