

Supplier Code of Conduct

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UniLodge Australia Pty Ltd (ACN 078 921 169), Essence Communities Pty Ltd (ACN 639 534 740) and their Related Bodies Corporate (collectively **UniLodge Living Group**)

Version 1.0

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1 Purpose

The Supplier Code of Conduct sets standards of behaviour which UniLodge Living Group expects of its suppliers, and of which our stakeholders would expect from us. This Supplier Code of Conduct incorporates UniLodge Living Group values and describes our expectations and minimum requirements of its suppliers relevant to:

- Corporate Governance
- Social Responsibility
- Health and Safety
- Modern Slavery
- Environmental and Sustainability Management
- Quality, Products, Materials and Services
- Data Protection, Privacy, Confidentiality and Cyber Security

Commitment and adherence to the principles set forth in this document will be considered by UniLodge Living Group in current and future procurement decisions.

2 Scope

This Supplier Code of Conduct is applicable to all suppliers of UniLodge Living Group, including all their contractors, subcontractors, volunteers, apprentices, trainees, shift workers, casual, part-time, and full-time employees.

This Supplier Code of Conduct applies to all procurement activities regardless of their value.

3 Introduction

UniLodge Living Group wants to do business with ethically, environmentally, and socially responsible suppliers and is committed to supporting genuine local businesses.

Suppliers are expected to proactively self-assess compliance and take action to remedy any shortcomings.

This Supplier Code of Conduct complements existing laws, policies, and UniLodge Living Group terms and conditions.

4 Corporate Governance

UniLodge Living Group endeavours to maintain a culture of sound corporate governance from the 'top down', recognising that this ultimately influences the conduct and success of the organisation.

UniLodge Living Group is governed by a series of policies, standards, procedures, best practices, and guidelines, embedded in sound ethics.

Suppliers are likewise expected to maintain effective corporate governance, conducting all business with integrity and in a fair, equitable, and professional manner.

5 Ethical Expectations

UniLodge Living Group procurement is conducted in an environment of integrity, probity, and accountability. We are committed to the highest ethical standards and expect our suppliers to commit to the same. Suppliers are expected to demonstrate this by doing the following:

5.1 Managing conflicts of interest

Suppliers must ensure that all direct or indirect conflicts of interest (whether actual, reasonably perceived or that could arise in future) are disclosed as soon as they become aware of the conflict. A conflict of interest includes all interests of UniLodge Living Group and its related stakeholders.

5.2 Demonstrating high standards of conduct

Suppliers must ensure that their business' behaviour is beyond reproach. Suppliers must not engage in fraudulent or corrupt activities including bribery, corruption, money laundering, or act in any manner which, by association, brings UniLodge Living Group or its stakeholders into disrepute.

5.3 Handling information

A diligent and practical approach must be taken to ensure sensitive information is appropriately managed in line with agreements and any associated policies.

5.4 Not engaging in inappropriate supply market behaviours

Suppliers should encourage innovation and competition and must not act in a manner which involves a misuse of market power or would be otherwise improper (e.g., collusive arrangements). This includes not procuring dumped goods.

5.5 Acting properly toward UniLodge Living Group employees

Suppliers are expected to be respectful of the ethical and code of conduct requirements that UniLodge Living Group employees are obligated to abide by, and not engage in actions which run counter to these obligations. Suppliers must not try to influence decision making through the use of inducements (e.g., offering gifts and benefits).

5.6 Model good business practices

Business should be conducted in a way that shows best practice in corporate management. This includes promoting a collaborative relationship where buyer and supplier work together to resolve issues in a timely and respectful manner. This helps to avoid contractual disputes and promotes good working relationships.

5.7 Sub-contractor payment terms

We want to do business with suppliers that offer payment terms to sub-contractors that are no less favourable than those provided to you by UniLodge Living Group, unless otherwise mutually agreed with the sub-contractor.

5.8 Meeting required standards

The goods and services provided should meet relevant compliance requirements and the Australian or New Zealand Standard (or an international standard in the absence of an Australian or New Zealand Standard) where specified. For building and construction this also includes using conforming products and materials.

6 Social Governance

UniLodge Living Group want to do business with suppliers who support the welfare of their employees and the local community. This can be achieved by:

6.1 Treating employees fairly

Suppliers must respect every employee's workplace rights and entitlements and ensure compliance with all relevant workplace laws, regulations, and instruments. This includes properly paying employees, giving them their entitlements, not discriminating unlawfully, and committing to workplaces free of harassment. This includes recognising the right of employees to be members of trade unions.

6.2 Acting against human rights exploitation in the supply chain

Suppliers must make all reasonable efforts to ensure that businesses within their supply chain are not benefiting from, engaged in, or complicit with, human rights exploitations such as forced or child labour, coercion, or any type of modern slavery practice as defined in the Modern Slavery Act 2018 (Cth).

6.3 Ensuring workplace diversity

UniLodge Living Group wants to enhance workplace diversity. Businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people, shall be highly valued. This includes embracing social benefit opportunities such as training and employment opportunities for disadvantaged and marginalised jobseekers.

6.4 Providing quality and secure local jobs

UniLodge Living Group values suppliers that provide quality and secure local jobs. These jobs provide:

- employment where people live
- permanency of employment
- certainty of hours
- fair wages and conditions
- superannuation and workers compensation.

7 Health and Safety

Suppliers must always:

- comply with work health and safety laws and regulations, and relevant UniLodge Living Group policies and procedures.
- consider the health and wellbeing of employees, residents, stakeholders, and the community.
- provide adequate training to ensure employees are competent.
- implement an audit program and internal controls as necessary to achieve compliance in health and safety.
- regularly manage and review workplace hazards.
- commit to minimising or eliminating hazards that risk the health or safety of persons or property and reporting such hazards to UniLodge Living Group.
- undertake due diligence to ensure that any involved parties comply with work health and safety laws and regulations.

8 Modern Slavery

UniLodge Living Group respect and support all human rights. Suppliers are expected to respect and support the protection of the human rights of employees, as well as individuals and communities affected by their activities. This includes a zero tolerance to Modern Slavery including all eight types of serious exploitations as defined by the Modern Slavery Act 2018:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour meaning where children are subjected to slavery or similar practices or engaged in hazardous work.

UniLodge Living Group expects all service providers and suppliers to consider the prevalence of child labour, ethical sourcing of materials, diversity, equal opportunity, forced or compulsory labour, and labour-management relationships in their industry, supply chains, and workplaces.

To safeguard against these modern slavery risks, current and future suppliers are expected to provide relevant upon request and cooperate with any audit UniLodge Living Group deems necessary.

All suppliers are requested to commit to the UniLodge Living Group Modern Slavery Policy and/or provide a copy of their own Modern Slavery Policy.

9 Environmental and Sustainability Management

UniLodge Living Group is committed to procuring in a way that also protects and advances environmental priorities. Suppliers play a pivotal role and are expected to:

- minimise waste and maximise recycling.
- reduce and/or offset carbon emissions.
- use solar or other renewable energy, where possible.
- reduce the use of energy, water, and other resources.
- prioritise the use of products and services approved by Good Environmental Choice Australia.
- reduce the use of hazardous and toxic substances and ensure their correct disposal.
- minimise packaging.
- have environmental product standards. have environmental process standards.

To safeguard against environmental and sustainability risks, current and future suppliers are expected to provide relevant upon request and cooperate with any audit UniLodge Living Group deems necessary.

To ensure transparency, all suppliers are requested to commit to the UniLodge Living Group Environmental Policy and Sustainability Policy, and/or provide a copy of their own relevant Policy.

10 Product and Material Quality

In all instances, suppliers should be transparent with UniLodge Living Group regarding the sources of all products and materials supplied to their company.

Where possible, suppliers should take action to educate their supply chains on Environmental, Social, and Governance management (including the life cycle of any materials and products used) and ensure the materials and products supplied to UniLodge Living Group have been ethically sourced through responsible and sustainable methods.

The following factors should also be considered:

- Third-party certified wood-based materials.
- Preference for materials that disclose potential health hazards and environmental impacts, conforms to a relevant international standard, and has publicly available lifecycle information.
- Locally extracted or recovered materials.
- Rapidly renewable materials, low embodied carbon materials and recycled content materials.
- Locally extracted, recovered, low emitting and easily recyclable materials.

11 Data Security

UniLodge Living Group takes the protection of its data and information very seriously. UniLodge Living Group is cognisant of the increased number of reported cyberattacks on businesses and aware that perpetrators continue to evolve the nature and sophistication of their attacks resulting in breaches.

Suppliers are expected to:

- Protect sensitive information through the implementation of reasonable safeguards.
- Comply with the obligations of the relevant Privacy Act.
- Implement adequate cyber security measures to manage internal and external cyber threats.
- Always maintain confidentiality and protect sensitive data.

12 Feedback and Concerns

If a supplier or other party becomes aware of a potential, actual, or perceived breach of this Supplier Code of Conduct, please contact UniLodge Living Group in writing at:

UniLodge Procurement

GPO Box 2481, Brisbane QLD 4001

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Chris Webb

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