

SUPPLIER CODE OF CONDUCT

Deakin TopCo Pty Ltd (**Levande**) is committed to responsible procurement and sustainable supply chain management. We acknowledge that we deal with a wide and varied range of suppliers, and endeavour to build partnerships with suppliers that operate in a manner which is consistent with our values and standards by considering social, environmental and human rights-related factors in our procurement decisions.

This Supplier Code of Conduct sets out our expectations and seeks to apply Levande's **Core Values** of Trustworthy, Caring and Excellence, in partnership with our third-party suppliers, consultants and contractors (**Suppliers**).

In accordance with contractual arrangements with our Suppliers, our expectation is that all Suppliers and their supply chain undertaking work in Australia will comply with Australian federal, state and local laws and regulations including but not limited to labour laws, environmental regulations and workplace health and safety standards. Where a supplier's operations occur outside Australia, our expectation is that they comply with legislation in the country(ies) of operations. When overseas entities undertake operations in Australia, we expect our supply chain to comply with Australian federal, state and local laws and regulation.

Suppliers to Levande are also expected to:

- have read and understood this Supplier Code of Conduct;
- act consistently with this Supplier Code of Conduct throughout their operations and apply it in their dealings with Levande;
- take reasonable steps to communicate this Supplier Code of Conduct to all employees, subcontractors, agents, suppliers or other third parties in their own supply chains with whom they engage in the performance of services or the supply of goods to Levande; and
- use reasonable endeavours to ensure suppliers' own supply chains also act consistently with this Supplier Code of Conduct.

Supplier commitment to the principles of this Supplier Code of Conduct will be considered when making procurement decisions and building relationships with our Suppliers.

Suppliers must comply with all obligations in any contract that a supplier may have with us. Where those terms are more onerous than the standards under this Supplier Code of Conduct, Suppliers shall adhere to the contract terms.

We acknowledge that human rights risks and impacts relate not only to our business activities, but also the relationships within our supply chain. We encourage the respect of human rights in our dealings with key suppliers by monitoring adherence to relevant corporate policies and management methods.

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We look to our suppliers and their supply chain to have formal policies or guidelines which indicate their overarching approach towards sustainability and corporate responsibility. The following sections set out how we expect all suppliers to operate and promotes policy inclusions that underpin ethical operations.

Environmental Performance

Take a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility.

- Comply with legislative and regulatory requirements as a minimum standard.
- Mitigate and managing the environmental risks and impacts associated with your business activities and your supply chain.
- Implement strategies to enhance energy efficiency, improve water management, and reduce waste in operations.
- Ensure large construction projects have an Environmental Management System.
- Endeavour to use materials that are recycled or reused, have low embodied energy and reduce resource usage.
- Encourage the development of environmentally friendly technologies.

Health and Safety

Implement work health and safety standards across operations. Your actions and policy should:

- Provide a safe and healthy workplace for employees and contractors, with appropriate information, instruction, training, and supervision.
- Respect residents and their health, safety and security in all activities.
- Encourage employees and contractors to identify workplace hazards or opportunities for health, safety and welfare improvements in the way you do business.
- Identify, eliminate or minimise, so far as reasonably practicable, risks from identified workplace hazards by:
 - Establish and report against measurable targets that track and verify progress and improvement.
 - Provide necessary information, education, training, instruction and supervision to support people in doing their work safely.
 - Comply with applicable health, safety and welfare legislation.

Labour and Human Rights

Respect and promote labour & human rights in the workplace and supply chain where applicable.

- Engage a workforce that is free from any form of enslavement or other means of coercion, including any type of forced, bonded or involuntary labour or any other form of modern slavery. Not engage in, or support the use of, any type of child labour and comply with

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minimum employment age limits defined by legislation or international conventions including International Labor Organisation (**ILO**) Convention 138.

- Elimination of all forms of forced, compulsory and child labour; or other forms of Modern Slavery as defined by the Australian Federal Modern Slavery Act 2018.
- Provide a mechanism for staff, stakeholders, and residents to raise concerns about unacceptable behaviour in good faith, while also offering protection from victimisation, harassment or disciplinary proceedings.
- Comply with relevant laws regarding providing fair remuneration and humane working conditions, including:
 - Laws regulating local wages, overtime compensation, and legally mandated benefits.
 - Ensuring that workers are not required to work excessive working hours per week, including overtime and have the option of adequate days off.
 - Respect the right of workers to freedom of association and collective bargaining, including the right to form and join trade unions or other work associations of their own choosing without harassment, interference, or retaliation.
 - Treat people with respect, without discrimination or harassment and comply with all laws in the collection, use and protection of personal information.
- Have a Remuneration and Work Hours Policy (including minimum living wages, and maximum working hours).
- Build awareness and capability of the workforce to embrace diversity and flexibility by:
 - Maximising diversity in leadership positions, in particular the proportion of women in management roles.
 - Creating a more inclusive workplace.

Governance and Compliance

Conduct business in an honest and responsible way, including having policies or guidelines, including:

- Comply with all laws and regulations associated with the sourcing, manufacturing, storage, transport and supply of products and services to our operations, including chain of responsibility.
- Act in an ethical and professional manner at all times, and disclose to Levande any actual, potential or perceived conflicts of interest.
- Educate and train the workforce to display and maintain a high degree of ethics including conflicts of interest disclosure.
- Identify and refraining from business practices that may involve bribery, corruption or facilitation payments, or that could result in reputational damage to Levande.
- Provide a mechanism to report any complaints made by employees, customers or your supply chain about activities or operations which have caused concern.
- Comply with the [Privacy Act 1988 \(Cth\) \(Privacy Act\) in Australia](#). Suppliers operating outside of Australia are expected to operate in line with [EU GDPR](#) and comply with legislation of their country(ies) of operation regarding data privacy and protection.

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- Commit to sustainable sourcing. Set this out in a policy which defines the principles guiding your procurement activities, and the procedures which employees must follow when selecting suppliers.
- Ensure your supply chain is paid on time and set out your invoice payment terms and methods in a policy statement.
- Provide ethical employment by supporting and promoting the rights of employees and your supply chain to create a vibrant, safe, and inclusive work environment.

Reporting and Reviews

At Levande, we use contract reviews, reporting, performance reviews, and audits to manage our partnerships with key suppliers, and we expect our suppliers to participate actively and openly in these activities. We encourage our suppliers and their supply chain who undertake physical works e.g. construction and maintenance to obtain confirmation of their certification and provide training to their suppliers on these expectations.

Contact for questions and reporting concerns

For direct queries about this Supplier Code of Conduct or our procurement practices, please contact procurement@levande.com.au

If you have any concerns regarding an improper state of affairs or conduct, please contact Levande using our Whistleblowing channel at whistleblowing@levande.com.au

Any matters raised will be handled confidentiality, and without risk of retaliation as per our Whistleblowing Policy.

Questions or Further Information

Please contact the Head of Procurement if you have any questions on this document.

Document Control

Revision	Date	Owner	Approver	Changes Made
1.0	06.02.2023	Head of Procurement	Levande Board	