

# Growthpoint Properties Supplier Code of Conduct Policy



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## 1. Preamble

Growthpoint Properties (“Growthpoint”) is strongly committed to full compliance with global human rights, labour standards, environmental laws, and ethical business practices.

We are also committed to being a leader in corporate sustainability, which means “meeting the needs of the present without compromising the ability of future generations to meet their own needs” and helping to achieve the **17 Sustainable Development Goals (SDGs)** adopted by the United Nations in 2015.

In particular, we have identified the following SDGs that align with our business culture and with our commitments and aspirations related to environmental, social, and governance (ESG) performance:

- SDG 1: End poverty in all its forms everywhere
- SDG 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture
- SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
- SDG 7: Ensure access to affordable, reliable, sustainable and modern energy for all
- SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation
- SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable
- SDG 13: Take urgent action to combat climate change and its impacts
- SDG 17: Strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development.

Growthpoint’s commitment to ethics and sustainability is implemented in the following ways:

### Environment:

- In accordance with our **Environmental Policy**, we commit to comply with all applicable environmental laws and continually improve Growthpoint’s environmental performance as an integral part of our business strategy.
- We invest in green buildings, energy efficiency, water efficiency, waste management, and renewable energy.
- We have committed to having all buildings within the direct control of the organisation achieve net zero carbon emissions by 2030 and all buildings in which Growthpoint has invested to do so by 2050.
- We aim to achieve a net positive impact on biodiversity, ecosystems, air, water, and oceans.
- We help build sustainable cities, towns, and neighbourhoods.

### Society:

- We adhere to the highest standards of labour practices and endeavour to create a positive work experience for each of our employees.
- We drive sustainable impact for the communities in which we operate, such as through supporting education initiatives, entrepreneurship development, and staff engagement.
- Through our Local Economic Development Policy, we aim to develop and foster access to procurement opportunities for previously disadvantaged businesses in communities within which Growthpoint operates.
- Through our **Human Rights Position Statement**, we commit to respecting human rights in line with the International Bill on Human Rights, the UN Guiding Principles on Business and Human Rights, the South African Constitution, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.



## Governance:

- Through our **Code of Ethics**, which is binding on every employee, officer, director, contractor and supplier, we commit to ensuring that Growthpoint and its agents conduct business according to the highest ethical standards.
- Guided by our Business Code of Conduct, employees are expected to conduct all internal and external dealings with integrity, consistently, and uncompromisingly, and display moral strength and behaviour which promotes trust, including avoidance of conflicts of interest in dealing with clients and suppliers.
- Employees must inform their line manager and the Head of Risk Management and Compliance if they and / or any family member (as defined by Growthpoint in its leave policy) are employed by a supplier or has an interest in that supplier.
- Our Social, Ethics, and Transformation Committee evaluates and ensures continuous improvement by Growthpoint in broad-based economic empowerment, enterprise development, social and economic development, oversight of values and the ethical framework, good corporate citizenship, the environment, climate change response, procurement, consumer relations, transformation, employment equity, and a stakeholder-inclusive approach.
- We publish an annual Integrated Report and ESG report to ensure transparency and accountability for our environmental, social, and governance performance. This includes reporting on key performance indicators and targets related to our sustainability commitments. Our Annual Integrated and ESG Reports can be found here: <https://www.growthpoint.co.za/investor-relations/financial-reports/>

## 2. Commitment to ethics and sustainability in our supply chain

In line with the commitments above, Growthpoint is committed to also ensuring high standards of ethics and sustainability in relation to goods or services provided to Growthpoint, or to any activity undertaken by a licensee, distributor, representative or as one having similar rights.

To deliver best practices and drive sustainability performance, our suppliers, contractors, and service providers are required to comply with relevant Growthpoint policies and procedures and with specific principles and standards set out in this document.

## 3. Implementation and compliance

When evaluating a supplier's compliance with this Supplier Code of Conduct, Growthpoint will consider

1. The size of the entity,
2. The nature of the entity's operations and activities, and
3. The nature of the contract with Growthpoint.

For example, large suppliers entering into multi-year contracts with Growthpoint will be required to demonstrate strong ethics and sustainability management systems and compliance with relevant Growthpoint policies. Smaller firms and individual contractors will be expected to comply with national legislation and international conventions related to human rights and labour practices that are mentioned in this Code.

At a minimum, suppliers must

- Read and confirm their commitment to meet the requirements of this Supplier Code of Conduct.
- Allow Growthpoint the right to verify compliance through requests for documentation, stakeholder interviews/surveys, and site visits, if required.
- Monitor their compliance with these guidelines and notify us of any significant breaches.
- Remedy identified non-compliance within a reasonable time agreed with Growthpoint.
- Provide Growthpoint with relevant performance and impact data, as agreed and practical.



To this end, supplier-specific sustainability requirements, targets, and reporting commitments may be defined in commercial agreements.

Failure to comply with the above will be regarded as a material breach of the Supplier Code of Conduct and the commercial agreement. If no resolution can be found, Growthpoint is entitled to terminate the contractual relationship with the Supplier.

We recognise that building a culture of ethics and appropriate sustainability management systems takes time and requires the allocation of resources. We don't expect all service providers to have everything in place immediately, but we will seek out suppliers that share our values and are committed to working towards compliance and going the extra distance over time.

We see this as an opportunity to create shared value and strengthen mutual business relationships. The following table is indicative of the types of systems we expect suppliers to have in place in line with their size and the nature of our service agreement:

Table 1: Expectations for sustainability management systems according to supplier size

Supplier size	Policies and Systems	Staff allocation
Large suppliers with multi-year and/or national contracts with GP	<p>Policies and systems are in place to ensure compliance with all parts of the GP Supplier Code.</p> <p>Initiatives are in place to go the extra distance on environmental and social performance, including ESG targets selected by the supplier.</p>	At least one full-time staff member appointed to manage ESG performance and ensure compliance with the Supplier Code of Conduct.
Medium-sized suppliers with occasional contracts with GP	Systems are in place to manage and ensure minimum compliance with i) environmental regulations, ii) GP's <u>Human Rights Position Statement</u> , and iii) GP's <u>Code of Ethics</u>	At least one or more staff members have a portion of their time allocated to managing ESG performance and ensuring compliance with the Supplier Code of Conduct.
Small and micro suppliers who provide ad hoc services to GP	Supplier acknowledges, understands, and signs GP Supplier Code of Conduct to indicate a commitment to comply with all requirements.	Supplier designates one staff member to monitor its compliance with GP Supplier Code

Suppliers may also go the extra distance and seek independent certification of their sustainability performance. This will provide confidence to GP that the relevant systems are in place.

As more and more businesses seek to manage sustainability in their supply chains, we believe that helping our suppliers strengthen their performance will help them differentiate their businesses, reduce risk, and enable efficiencies and improvements. We, therefore, look forward to working in partnership with our suppliers to improve and innovate.



#### 4. Supplier responsibilities

It is the responsibility of the supplier to meet the requirements outlined in this Supplier Code of Conduct in their own organisation and in their supply chain.

- 4.1. Corporate governance and ethical business practices
  - 4.1.1. Comply with all relevant local and national laws and regulations in relation to ethical behaviour, anti-bribery, anti-corruption, whistleblowing, and other relevant business practices.
  - 4.1.2. Have a written policy that outlines appropriate conduct and standards of personal behaviour of employees.
- 4.2. Modern slavery, labour practices & human rights policies
  - 4.2.1. Comply with relevant legislation in relation to employment and human rights.
  - 4.2.2. Conduct their business in a manner that respects and supports the Universal Declaration of Human Rights.
  - 4.2.3. Respect employees and offer a safe workplace free of direct or indirect discrimination, harm, intimidation, harassment, or fear.
  - 4.2.4. Have written workforce policies that include diversity and equal opportunity in recruitment.
  - 4.2.5. Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery, or human trafficking.
  - 4.2.6. Prohibit the use or threat of physical or other punishment or the physical, sexual, or psychological abuse or inhumane treatment of workers or members of the community.
  - 4.2.7. Comply with international and local obligations relating to the employment of children, including adhering to minimum legal working age.
  - 4.2.8. Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development.
  - 4.2.9. Respect workers' rights, in accordance with applicable laws, to freedom of association, to establish and join or not join workers' associations, and to engage in lawful industrial activity, without interference, intimidation or harassment.
  - 4.2.10. Ensure that the above human rights standards extend to their own supply chain, including service providers and sourcing of materials and products.
  - 4.2.11. Provide a visible and accessible mechanism for staff and suppliers to raise complaints or grievances, including through an anonymous channel, and for the supplier to address the complaint and provide feedback in a timely manner.
- 4.3. Wages, benefits & working hours
  - 4.3.1. Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers.
  - 4.3.2. Provide workers with clear and understandable information about all relevant employment conditions before they enter employment.
  - 4.3.3. Ensure working hours do not exceed the maximum hours per week required by applicable laws.
  - 4.3.4. Provide workers with appropriate training to perform their duties and comply with these guidelines.
- 4.4. Occupational Health & safety
  - 4.4.1. Comply with all relevant local and national occupational health and safety laws and regulations appropriate for the nature and scale of their business and services.
  - 4.4.2. Provide a safe and healthy working environment and take all feasible steps to prevent incidents and injuries.
  - 4.4.3. Have an adequate, risk-based health and safety approach, including, for example, providing relevant instructions and training that is understandable to all employees.
  - 4.4.4. Ensure that employees have the right to refuse a work situation if they reasonably believe that it presents an imminent and serious risk to their health and safety.
  - 4.4.5. Check all work premises, including, in applicable cases, accommodation and canteens, regularly to maintain fire safety and hygiene standards on an everyday basis.



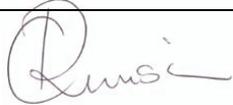
- 4.5. Environment
  - 4.5.1. Comply with all relevant environmental/sustainability legislation in the national and local jurisdictions in which they operate.
  - 4.5.2. Work towards greater efficiency in the use of energy, waste, materials, and water usage that is appropriate for the nature and scale of their business services.
  - 4.5.3. Support the circular economy by eliminating waste and pollution; circulating products and materials through reuse, repair, refurbishing and recycling as long as possible; and designing products and processes for durability, reuse, and recyclability.
  - 4.5.4. Minimise negative impacts on nature, including ecosystems and biodiversity. Wherever possible, seek to have a net-positive impact on nature.
  - 4.5.5. Assess how their business could be impacted by climate change or contribute to climate change through their operations, services, products, and supply chain, and seek to mitigate climate change impacts and strengthen adaptation to climate change.
- 4.6. Community and stakeholder engagement
  - 4.6.1. Engage with communities and stakeholders that are affected and/or influenced by the supplier’s activities to ensure ongoing dialogue and responses to concerns or risks.
  - 4.6.2. Provide a visible and accessible mechanism for stakeholders to raise complaints or grievances, including through an anonymous channel, and for the supplier to address the complaint and provide feedback in a timely manner.
  - 4.6.3. Seek to contribute to the strengthening of communities through skills development, urban renewal projects, or educational and health-related projects.

**5. Grievance mechanism**

Suppliers or other stakeholders can submit a complaint or grievance in relation to this Supplier Code of Conduct or any other matter via GP’s **anonymous whistleblowing hotline at 0800 167 463**.

Notifications, questions, or complaints specifically related to this Supplier Code of Conduct can also be directed to Growthpoint’s Procurement Team at [suppliercompliance@growthpoint.co.za](mailto:suppliercompliance@growthpoint.co.za) copying [scc@growthpoint.co.za](mailto:scc@growthpoint.co.za)

**6. Policy approval**

Document Title		Supplier Code of Conduct Policy		
Growthpoint Properties				
Approval	Name	Designation	Signature	Date
Document Owner	Chanel Rennison	National Procurement Manger		November 2022
Approved by	Andile Sangqu	Chairman of the Social, Ethics and Transformation Committee		November 2022

**Declaration of acknowledgement by supplier**

I/We, the undersigned authorised representative/s of the Supplier, hereby certify that the Supplier accepts and complies with the Supplier Code of Conduct and related Growthpoint policies and commits to working with Growthpoint to address any compliance gaps in a timely manner.

Full company name: .....

Corporate identity number: .....

Place: .....

Date: .....

[1st signature]

[2nd signature]

Full name:

Full name:

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Position:

Position:

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Signature:

Signature:

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