



Sustainable Procurement Policy

Version 2.0
1 January 2018

1. Introduction

At Vicinity Centres (Vicinity), we *reimagine destinations of the future, creating places where people love to connect*, and in doing so strive to enhance the positive outcomes of our business activities in the environment and communities in which we operate. This is consistent with our purpose of *enriching community experiences*, and extends beyond our own operations and into our supplier relationships.

Vicinity continues to develop and encourage procurement practices that proactively address environmental, social and governance (ESG) risks, impacts and opportunities across our direct and indirect spend. We are committed to developing and maintaining effective working relationships with suppliers that are aligned with our values, principles and commitment to sustainability. We additionally expect all key supply partners to demonstrate their own commitment to sustainability, and we aim to work in collaboration with such partners to realise social and environmental outcomes beyond those achievable on our own.

Our extensive network of centres gives us a unique opportunity to leverage far reaching sustainability outcomes through our suppliers. We therefore see effective and proactive management of our procurement activities as a powerful way in which to identify innovative and scalable solutions that address broader social and environmental challenges, and create a positive impact on communities across Australia.

This policy supports the sustainable procurement objectives stated within Vicinity Centres *Procurement Policy*.

2. Our Commitment

To deliver on our commitment, Vicinity will, where appropriate and possible:

- Work collaboratively with our suppliers to achieve the sustainability objectives within Vicinity's Sustainability strategy, and the commitments outlined in Vicinity's *Community Policy*, *Human Rights Policy* and *Environment Policy*,
- Seek to build long-term relationships with our key suppliers to monitor, assess and continually improve theirs and our own sustainability performance,
- Encourage and support our suppliers to minimise sustainability risks and impacts associated with their own business activities and promote practices that drive enhanced environmental and social outcomes,
- Promote the use of diverse supply partners, including local businesses and social enterprises, wherever possible,
- Develop strategies to acquire goods and services that have the least impact on the environment and communities, within our capacity to do so,
- Undertake regular assessments to understand evolving direct and indirect ESG risks, impacts and opportunities in Vicinity's business operations,
- Consider and account for ESG risks and opportunities in Vicinity's supplier selection process, procurement contracts and the ongoing supplier relationship management program,
- Facilitate supplier feedback opportunities to support sustainable procurement and the implementation of this Policy,
- Monitor the sustainability outcomes of our suppliers and strive to continuously improve our performance,
- Promote awareness of this policy among our people and enable them to apply sustainability principles in making procurement and purchasing decisions for and on behalf of Vicinity,
- Ensure that our suppliers understand our expectations of them, and gain their commitment to act in accordance with Vicinity's Supplier Sustainability Code of Practice,
- Act in accordance with our Code of Conduct and ensure that all procurement processes are conducted lawfully, with integrity and to high ethical standards,
- Gain commitment from our suppliers to comply with all applicable laws and regulations related to their products and/or services, their workers and the environment, wherever they operate, and
- Transparently disclose our supply chain impacts and sustainable procurement efforts and outcomes to our stakeholders through public reporting at least annually.

3. Roles and responsibilities

The commitments outlined in this policy are implemented at centre level, as well as by business functions in line with Vicinity's Sustainability Strategy, which aims to achieve broad value creation for Vicinity and our stakeholders.

3.1 Responsibilities of the Board of Directors

- Oversee Vicinity's Sustainability Strategy, and
- Review this policy in light of any material changes to our commitments, or otherwise, every two years.

3.2 Responsibilities of CEO and Managing Director and EC

- Integrate the Policy into governance and business processes,
- Ensure that our supply chain is managed in line with this Policy, and
- Perform monitoring and reviews and notify findings to National Procurement as necessary.

3.3 Responsibilities of National Procurement

- Respond to queries on the application of this Policy,
- Regularly review this Policy in light of legislation, organisational changes and developments in sustainability best practice, or at a minimum, every two years,
- Support the business in the implementation of this Policy with the assistance of Sustainability, and
- Report to the CEO and Managing Director and the EC on progress.

3.4 Responsibilities of all Vicinity personnel

- Understand and comply with this Policy.

4. Related documents

4.1 Internal references

Vicinity's commitment to sustainable procurement is supported through a number of corporate policies, strategies and procedures, including:

- Code of Conduct
- Procurement Standard and Procedure
- Supplier Sustainability Code of Practice
- Supplier Sustainability Questionnaire
- Buy it, Use it Guide
- Sustainability Strategy
- Anti-Bribery and Corruption Policy
- Fraud Policy
- Conflicts of Interest Policy
- Whistleblower Protection Guidelines
- Health and Safety Policy and Procedures
- Community Policy
- Human Rights Policy
- Environment Policy



Grant Kelley
CEO and Managing Director

1 January 2018