

SUPPLIER CODE OF CONDUCT

Abacus is committed to promoting ethical, environmental and social standards throughout our supply chain. The Abacus supply chain encompasses a broad range of products and services across our operations and includes contractors, sub-contractors, consultants as well as suppliers of products and services. We expect all of our supply chain to conduct business in a safe, responsible and equitable manner and in compliance with all applicable laws, regulations and standards.

The intent of the Supplier Code of Conduct is to clearly communicate Abacus' expectations of our suppliers, including throughout their own supply chains, in providing products and services to us. Suppliers to Abacus must review this Code of Conduct and confirm that their organisations and their extended supply chain conform with its expectations and requirements. As with our policies, this Supplier Code of Conduct may evolve over time in response to our business needs and the reasonable expectations of our stakeholders.

Abacus expects its supply chain to:

<p>Governance and risk</p>	<p>Conduct their business in an honest and responsible way in accordance with high ethical standards, including:</p> <ul style="list-style-type: none"> • ensure they meet their contractual obligations to us and their own suppliers; • not engage in any form of bribery, corruption or fraud; • provide a full disclosure to Abacus of any actual or potential conflict of interest that the supplier, or any of its employees, agents and subcontractors, may have in relation to the duties being performed as soon as practicably possible; • be able to demonstrate effective and transparent allocation of responsibilities between Board and management, where an applicable management structure exists; • not engage in any collusive or anti-competitive conduct in the preparation of quotations or tenders; and • comply with all applicable laws, regulations and standards including those related to Workplace Health and Safety and Modern Slavery and in relation to employment practices, wages and benefits, working conditions and equal opportunity.
<p>Environment</p>	<ul style="list-style-type: none"> • Understand and manage environmental risks and impacts associated with their business activities, and across their supply chains, and report any incidences or near misses to your Abacus representative. • Consider sourcing solutions that minimize their environment and climate change impact in the course of doing business. All required environmental permits and registrations are obtained and maintained.
<p>Health and safety</p>	<p>Implement workplace health and safety standards across their operations will comply with legislative requirements, including:</p> <ul style="list-style-type: none"> • Develop and maintain a work health and safety policy and management system that is appropriate to the size of their company and meets relevant legislative requirements.



	<ul style="list-style-type: none">• Comply with the Abacus Work Health and Safety management system requirements when working in an Abacus property.• Provide a safe and healthy work environment for employees, customers and contractors, with appropriate information, instruction, training and supervision.
Human rights	<ul style="list-style-type: none">• Respect and promote human rights in the workplace, and value chain where applicable, including appropriate labour practices.• Uphold the guiding principles set out in the Abacus Human Rights Policy.
Social responsibilities	<ul style="list-style-type: none">• Provide access to employee training and development as required.• Promote “zero” tolerance of unlawful discrimination, bullying and harassment and the inclusion of all diverse groups in the communities in which we operate

Suppliers are expected to:

- communicate this Supplier Code of Conduct within their own organisation as well as their supply chain, so that all are aware of, and comply with this Code of Conduct;
- demonstrate a willingness and commitment to comply with this Code of Conduct; and
- proactively work with their own suppliers and confirm the principles within this Code of Conduct are met.

Abacus wishes to work proactively with our suppliers and may from time to time carry out assessments of the practices of its suppliers to confirm alignment with this Code of Conduct. This may include self-assessment by suppliers, or a request for additional information, or site visit, if appropriate, based on identified risks.

Suppliers are expected to:

- participate actively by responding in full and be open and honest in response to any request for information; and
- if required, work collaboratively with Abacus to address any areas of non-compliance or shortcomings.

In the event that non-compliance continues on an ongoing basis, we reserve the right to terminate the relationship.

This Code of Conduct is to be read in conjunction with the other Abacus corporate policies which are available on the Abacus website, which also outline our commitment to the ethical, environmental and social responsibilities of our business, including:

- Sustainability and Environmental Policy;
- Human Rights Policy;
- Diversity and Inclusion Policy;
- Work Health and Safety Policy; and
- Whistleblowing Policy.

We expect all of our suppliers to review and ensure alignment with the values outlined in each of these policies.

CONTACT

If you have any questions, or concerns about compliance with this Code of Conduct while working for or with Abacus, or want to report illegal or unethical activities, email Abacus compliance at whistleblower@abacusproperty.com.au or talk to your Abacus representative.



All reports are investigated promptly, fairly and confidentially, without recrimination against the person reporting an incident.

ADOPTED:	15 August 2019
LAST BOARD REVIEW:	15 August 2019
COMPLIANCE AND RISK REVIEW:	30 November 2019