

1. Purpose

In alignment with its corporate values, Waypoint REIT is committed to high standards of ethical conduct and to promoting and supporting a culture of ethical behaviour and good corporate governance. This Supplier Code of Conduct (**Code**) outlines the minimum environmental, social and governance (**ESG**) standards of behaviour that Waypoint REIT expects from its suppliers.

Waypoint REIT is Australia's largest listed REIT owning solely fuel and convenience retail properties; it has a high-quality network across all Australian states and territories. Our approach to suppliers considers the structure of our business and the passive nature of our business model. Through this Code Waypoint REIT seeks to promote fair, transparent, ethical, environmental, and social standards throughout its supply chain, which include contractors, sub-contractors, consultants and suppliers (**Suppliers**) who conduct business in a safe, responsible and equitable manner and in compliance with all applicable laws, regulations and standards.

This Code has been written with regard to the United Nations Global Compact (**UNGC**) principles and the International Labour Organisation's (**ILO**) Declaration on the Fundamental Principles and Rights at Work.

2. Ethical business practice and corporate governance

Waypoint REIT believes that good corporate governance is integral to the conduct of sustainable, equitable and reputable business operations.

Waypoint REIT expects, where it is reasonable to do so, that Suppliers:

- a) read and understand this Code;
- b) read, understand and comply with all applicable laws and regulations relating to the operation of their business with regard to bribery, corruption, anti-money laundering, counter terrorism;
- c) comply with all applicable laws and regulations, including those relating to international trade (sanctions, export controls and reporting obligations), data protection and privacy and antitrust/competition laws;
- d) adhere to the principles set out in this Code when conducting business with Waypoint REIT;
- e) have effective and transparent allocation of responsibilities between board and management, where an applicable management structure exists;
- f) promptly advise Waypoint REIT of any and all actual, potential or perceived conflicts of interest that may affect decisions made by the supplier in connection with their dealings with Waypoint REIT; and
- g) conduct their business in accordance with high ethical standards.

3. Social responsibilities

3.1 Diversity and inclusion

Waypoint REIT understands the benefits of diversity and is committed to the inclusive, ethical and fair treatment of its employees.

Suppliers are expected to:

- a) promote an inclusive workplace where employee differences including gender, sexual preference, age, culture, disability and lifestyle choice are respected and valued;

- b) strive to provide a safe workplace that is free of direct or indirect discrimination, harassment or bullying; and
- c) strive to ensure that opportunities that should not be denied (e.g. employment, subcontracting, or business partnership) based on discriminatory practices.

3.2 Labour and employment practices

Waypoint REIT believes appropriate labour and employment practices are fundamental to any workplace.

Suppliers are expected to:

- a) take reasonable steps to ensure there are no instances of child labour in accordance with the International Labour Organisation's (ILO) Minimum Age Convention, forced or compulsory labour in accordance with the ILO Forced Labour Convention or other forms of modern slavery in their operations and supply chain, and comply with all applicable laws and regulations relating to modern slavery;
- b) take reasonable steps to proactively identify and remediate any instances of child labour, forced or compulsory labour or other forms of modern slavery in their operations and supply chain, and where required by legislation, report on the risks of modern slavery practices in their business operations and supply chain;
- c) promptly inform Waypoint REIT if they identify, are informed of, or become aware of instances or allegations of slavery or human rights abuses in their operations and supply chains and work to provide just remediation (as outlined in section 9. Compliance with this Code);
- d) comply with applicable laws and regulations relating to human rights, employment conditions, working hours, just and fair remuneration and acceptable working conditions for employees (e.g. safe, sanitary, clean water, sanitation facilities, adequate space, and other basic needs) in accordance with the ILO, including no wage deduction as disciplinary measure, no corporal punishment and prohibit any form of physical or psychological abuse, and to provide all employees with documentation on wages;
- e) follow ethical hiring practices, support fair pay and working conditions for employees including adequate weekly rest periods in accordance with the ILO Weekly Rest Conventions, leave, minimum living wage (that covers basic needs, including food, housing, healthcare, education, and other essentials, allowing for some discretionary income), freedom of association and collective bargaining; and
- f) allow workers to work hours that are reasonable or that do not endanger the health and safety of the worker, their fellow workers, or any member of the public.

4. Workplace health and safety

Health, safety and wellbeing is a business priority and Waypoint REIT actively promote a culture of people protecting people.

Suppliers are expected to take reasonable steps to:

- a) prevent health and safety hazards;
- b) comply with all relevant local and national laws and regulations with regard to occupational health and safety and the provision of health-related benefits to employees;
- c) have an employee assistance program in place that employees can access as required;
- d) have written safety and health policies and standards; and

- e) have a documented system to record and reduce work-related injury and illness.

5. Environment

Waypoint REIT expect Suppliers take all reasonable steps to (where applicable) comply with all required environmental permits and registrations.

6. Risk management

Waypoint REIT recognises the importance of mitigating business risks in a timely manner.

Suppliers are expected to take reasonable steps to:

- a) take active steps to identify, manage and control business risks associated with their operations, including but not limited to operational risks as well as risks relating to security, labour, business ethics, and corporate governance; and
- b) implement and maintain a business continuity plan and an appropriate risk management framework across their organisation.

7. Supply chain management

Key suppliers are expected to take reasonable steps to:

- a) communicate and encourage compliance with this Code within its business and supply chain;
- b) proactively work with its own supply chain to adhere to these principles outlined in this Code;
- c) adhere to acceptable business practices with their own suppliers, including providing timely payment; and
- d) monitor their supply chain's compliance with this Code, notify Waypoint REIT of any breaches (as outlined in section 9. Compliance with this Code) and work with Waypoint REIT to remedy any breaches.

8. Privacy and Confidentiality

Waypoint REIT's **Privacy Policy** outlines Waypoint REIT's privacy commitment and explains how it collects, uses, discloses, and protects information. Information supplied to Waypoint REIT will be recorded on Waypoint REIT systems and will be maintained and used in accordance with relevant legislation, including the Privacy Act 1988 and the Corporations Act 2001, to the extent that the legislation applies to the information. Confidential information will be dealt with in accordance with Waypoint REIT's **Privacy Policy** from time to time which can be found on Waypoint REIT's website

<https://waypointreit.com.au/investors/?page=privacy-policy>

9. Compliance with this Code

From time to time, Waypoint REIT may request its key suppliers to confirm acknowledgement of this Code. Where Waypoint REIT suspects a breach of this Code, it expects suppliers to cooperate and provide supporting evidence as may be reasonably required to help Waypoint REIT monitor compliance with this Code. Waypoint REIT may carry out verifications via supplier self-assessments (Supplier Questionnaires), or a request for additional information if appropriate based on identified risks.

We expect key suppliers who work with or for Waypoint REIT to take reasonable steps to:

- a) monitor their compliance to this Code and provide information to Waypoint REIT on request about their compliance with this Code (which may be achieved through the Supplier Questionnaire); and
- b) raise any concerns about compliance or ethics issues or to report illegal or unethical activities or labour violations within their supply chain to email: compliance@waypointreit.com.au.

All matters raised in good faith through these reporting lines will be handled in a confidential manner and in accordance with Waypoint REIT's **Whistleblower Policy**.

Alternatively, if you feel unable to raise an issue in this way, you can make a confidential, anonymous call to the Waypoint REIT's independent and confidential external whistleblower hotline called Stoplevel Pty Ltd at:

Online: <http://waypointreit.stoplinereport.com>

Phone: 1300 30 45 50 (Australia)
+61 3 9811 3275 – Overseas (reverse charges)

Email: waypointreit@stopline.com.au

Post: Waypoint REIT c/o Stoplevel,
PO Box 403
Diamond Creek VIC 3089

APP: Search for Stoplevel365 (free download from the Apple iTunes store and Google Play)

Last Reviewed 13 December 2024