

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.

Through this code Waypoint REIT seeks to promote 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.

2. Corporate governance and management

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

Suppliers are expected to:

- (a) comply with all applicable laws and regulations relating to the operation of their business with regard to bribery, corruption, anti-money laundering, counter terrorism;
- (b) comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls (including, laws and regimes enacted by Australia, the UN and other countries as appropriate);
- (c) have effective and transparent allocation of responsibilities between board and management, where an applicable management structure exists;
- (d) not engage in any collusive or anti-competitive conduct in the preparation of quotations or tenders;
- (e) not offer or receive gifts, benefits, and hospitality that:
 - (1) could inappropriately influence, or be perceived to inappropriately influence, the outcome of business transactions; or
 - (2) can be perceived to obtain any unfair or inappropriate advantage.
- (f) immediately provide a full disclosure of any possible, perceived and/or actual conflict of interest that the supplier, or any of its employees, agents and subcontractors, may have in relation to its relationship 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; and
- (b) strive to provide a safe workplace that is free of direct or indirect discrimination, harassment or bullying.

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 all 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) remediate any instances of child labour, forced or compulsory labour or other forms of modern slavery in their operations and supply chain; and
- (c) comply with all applicable laws and regulations relating to human rights, employment conditions, working hours, wages, benefits and entitlements.

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:

- (a) take reasonable steps to 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 works with Suppliers who share its commitment to minimizing disruption to the environment as demonstrated by (where applicable):

- (a) compliance with all required environmental permits and registrations;
- (b) continuously seeking to improve environmental and resource management; and

- (c) measuring, managing, and reporting environmental data in accordance with applicable laws and regulations.

6. Risk management

Waypoint REIT recognises the importance of mitigating business risks in a timely manner. Suppliers are expected 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 plans and an appropriate risk management framework across their organisation.

7. Supply chain management

Waypoint REIT is committed to working in partnership with its Suppliers to realise the full value of its relationships and to positively contribute to its stakeholder communities and the environment.

Suppliers are expected 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; and
- (c) adhere to acceptable business practices with their own suppliers, including providing timely payment.

8. Privacy and Confidentiality

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

9. Assessment

From time to time, Waypoint REIT will request its key suppliers to confirm alignment with this code. This may include self-assessment by Suppliers, or a request for additional information if appropriate based on identified risks.

Suppliers are expected to respond in full and be open and honest in response to any request for information.

10. Contact

If you have any concerns about compliance or ethics issues while working for or with Waypoint REIT or want to report illegal or unethical activities, email: compliance@waypointreit.com.au

All matters raised in good faith through these reporting lines will be handled in a confidential manner.

Alternatively, you may raise concerns anonymously via the following channels:

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

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

Email: waypointreit@stopline.com.au

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

App: Search for Stopline365 (free download from the Apple iTunes store and Google Play)

Last Reviewed 19 October 2022