

# Responsible Sourcing Policy

Effective Date	20 January 2021
Version	1.0
Company	Frasers Property Limited
Company Registration No.	196300440G
Approved By	Group CEO

## 1 Purpose

Frasers Property Limited (“Frasers Property”) is committed to inspiring experiences and creating places for good, by acting progressively, producing and consuming responsibly, and focusing on investing in our people and the communities we serve. We believe in raising sustainability ideals across our value chain in partnership with our stakeholders to create a more resilient business. We aim to create lasting shared value, for our people, the businesses and communities we serve, within the ecosystem in which we will live for generations.

Frasers Property engages a diverse group of suppliers globally when sourcing for materials and services essential to our business. It is key that our suppliers adhere to environmental, social and governance best practices and operate in a manner consistent with Frasers Property’s commitments as suppliers contribute to the overall success of our sustainability goals such as net-zero carbon by 2050. Services and capital good procured from suppliers made up a large proportion of our carbon footprint under Scope 3 emissions. We believe that a partnership-based approach with our suppliers will drive positive change, strengthening our supply chain and the businesses within it.

The purpose of this Responsible Sourcing Policy (“Sourcing Policy”) is to outline Frasers Property’s commitment to responsible sourcing and expectations of our suppliers in this regard.

## 2 Scope

This Sourcing Policy will be applied in all sourcing and procurement decision-making processes across Frasers Property’s businesses that we have operational control. We request all suppliers to align with the principles and strive to abide to the expectations set out in Section 4: Our Expectations of this Sourcing Policy. The term ‘supplier’ covers any supplier, contractor and subcontractor that provides products and/or services to Frasers Property.

## 3 Our Principles

Frasers Property upholds the following principles and expects the same of our suppliers:

- Act responsibly to minimise the impact of our business and supply chain on the environment.
- Endeavour to create workplaces that are fair and equitable for all.
- Respect and promote human rights and commit to eliminating human rights harm and human

trafficking from our supply chain.

- Create a safe workplace for all, including that of our suppliers.
- Uphold strong business ethics with businesses conducted lawfully without bribery, corruption or any type of fraudulent behaviour.

## 4 Our Expectations

Suppliers to Frasers Property are expected to have read, understood, and acted consistently with this Sourcing Policy. Suppliers shall communicate the expectations of this Sourcing Policy to their own supply chain when supplying products or services to Frasers Property. Where the terms in the main contract with Frasers Property (and/or its subsidiaries, affiliates) are more onerous than the requirements under this Sourcing Policy, suppliers shall adhere to the contract terms.

Suppliers are obligated to comply with all applicable laws and regulations relating to environmental compliance, human rights, labour practices, health and safety, business integrity, anti-corruption and bribery, in the jurisdictions that they operate.

We also expect our suppliers to align to our expectations in the following areas:

- **Environmental Management**  
Manage the environmental impacts of their products and services and continuously seek to improve their environmental efforts.
- **Human Rights and Labour Management**  
Eliminate human rights violation and oppose human trafficking from its business operations and supply chain. Practice responsible employment by providing fair and transparent employment conditions to their employees.
- **Health, Safety and Well-being**  
Manage health and safety risks and ensure workers are safe and protected.
- **Business Ethics and Integrity**  
Uphold strong business ethics and ensure businesses are conducted lawfully and with integrity.

Suppliers may refer to *Appendix A* for best practice guidelines.

## 5 Reporting Misconduct

If a supplier becomes aware of any circumstance or action that contravenes or appears contravene this Sourcing Policy, this may be reported confidentially via [reporting@frasersproperty.com](mailto:reporting@frasersproperty.com).

## 6 Application

Frasers Property may carry out periodic checks on the supplier's policies and practices and reserves the right to request documentation and/or evidence that support the alignment with this Sourcing Policy.

Frasers Property acknowledges that it may take time for some suppliers to achieve full alignment with this Sourcing Policy, and we commit to working with suppliers to build supplier understanding and capability to meet our expectations. We have included a list of possible practices that is expected of our suppliers in Appendix A to support alignment with this Sourcing Policy. We recognise the importance of working collaboratively with our suppliers on achieving alignment and will provide an opportunity for improvement wherever it is appropriate to do so.

We encourage suppliers to raise concerns about responsible sourcing or ethical behaviour with their Frasers Property business contact.

Please complete the acknowledgement declaration in *Appendix B* and submit to your Frasers Property business contact. Failure to do so may hinder suppliers' ability to continue doing business with us.

## **7 Related Documents**

This Sourcing Policy also takes reference from the following internal policies and international standards and conventions:

- Group Corporate Social Responsibility Policy
- Group Sustainability Framework and Goals
- Group Diversity and Inclusion Policy
- United Nations Global Compact Principles
- United Nations Universal Declaration of Human Rights

## **8 Policy Review**

This Sourcing Policy shall be reviewed by Frasers Property's Group Sustainability Team every two years, and at any other times considered appropriate by the Group Sustainability Team, or the Group Sustainability Steering Committee. This policy shall be implemented as appropriate by the business units.

## Appendix A

Based on Frasers Property's Responsible Sourcing Policy, we expect our suppliers to uphold responsible conduct in their organisations. Below are best practices that our suppliers may adopt or go beyond to show leadership in the supply chain.

Focus Area	Guidelines for Suppliers
<b>Environmental Management</b>	<ol style="list-style-type: none"> <li>I. Recognise natural resources as valuable resources and strive to manage and conserve the use of natural resources such as energy, water and raw materials.               <ul style="list-style-type: none"> <li>○ Reduce environmental impacts, as practicable by minimising waste generation and pollution including greenhouse gases and avoid release of harmful materials to the environment.</li> <li>○ Adopt use of technology and innovative solutions as tools to improving their environmental efforts, where applicable.</li> </ul> </li> <li>II. Provide and procure sustainable products and services including products with verified ecolabels, from sustainable sources or products made from recycled content, where applicable.</li> <li>III. Raise awareness on environmental management and compliance with regulatory requirements through training and engagement.</li> <li>IV. Implement and maintain environmental policies and procedures which meet local or international guidelines and standards such as ISO 14001: 2015, where relevant and required.</li> </ol>
<b>Human Rights and Labour Management</b>	<ol style="list-style-type: none"> <li>I. Foster an inclusive workplace free of discrimination, harassment, intimidation or coercion relating directly or indirectly to race, religion, gender, marital status, sexual orientation, pregnancy, age, nationality, and disability.</li> <li>II. Recognise and respect the rights of workers to freedom of association and collective bargaining. Provide all workers with access to fair and equitable treatment and opportunities and enjoy a workplace and treated with respect and dignity</li> <li>III. Ensure employment is freely chosen and that all work will be voluntary, and no child labour or forced labour is used. Provide employees with transparent employment contracts.</li> <li>IV. Assess, manage and adopt appropriate measures to ensure that sourcing and procurement of products, services, materials and labour are from sources free of human rights infringement.</li> <li>V. Respect rights and title to property and land of the individual, indigenous people and local communities.</li> <li>VI. Raise awareness through education and training on human rights and labour management risks in the supply chain.</li> </ol>

<b>Health, Safety and Well-being</b>	<ol style="list-style-type: none"> <li>I. Engage workers through training and support to enable workers to conduct activities in a responsible manner, in compliance or exceed regulatory requirements.</li> <li>II. Provide safe work environment and personal protective equipment.</li> <li>III. Implement and maintain health and safety policies and procedures which meet local or international guidelines and standards such as ISO 45001, where relevant and required.</li> <li>IV. Monitor and evaluate health and safety performance and provide transparent reporting of performance.</li> </ol>
<b>Business Ethics and Integrity</b>	<ol style="list-style-type: none"> <li>I. Ensure that no bribes, payments of facilitation, gifts, inappropriate level of entertainment or anything of inappropriate value are offered to Frasers Property's employees with purpose of soliciting benefits or favourable treatment from Frasers Property.</li> <li>II. Implement and maintain appropriate policies and procedures to prevent fraudulent behaviour including but not limited to, corruption, bribery, protect data privacy and anti-competitive behaviour, where applicable.</li> <li>III. Report any misconduct or raise any concern to Frasers Property for any non-compliance and suspicious behaviours.</li> </ol>

**Appendix B**

**Responsible Sourcing Policy**

**Acknowledge Form**

As a supplier, we have read and acknowledge this Responsible Sourcing Policy and shall apply in all dealings with Frasers Property Limited. We understand that failure to sign and return this Responsible Sourcing Policy Acknowledgement Form may hinder our ability to work with Frasers Property Limited. We will strive to ensure that our suppliers used in any dealings with Frasers Property Limited will act consistently with this Responsible Sourcing Policy.

Should there be any concerns pertaining to the expectations, we will raise this with the Frasers Property Limited business contact.

I, \_\_\_\_\_, on behalf of \_\_\_\_\_ with

Company Registration No. \_\_\_\_\_ acknowledge that we accept and will act in

accordance with the expectations stipulated.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Document Reference	Revision No.	Effective Date	Prepared By	Reviewed By	Approved By	Next Review Due
	1.0	20 January 2021	Group Sustainability Team	N.A.	Group CEO	20 January 2023