

RESPONSIBLE PROCUREMENT

Engaging with our Suppliers

The Urbis and Cistri Group takes its commitment as an ethical and responsible business seriously. This extends to the adoption of responsible procurement practices including Urbis committing to:

- avoiding causing or otherwise contributing to adverse human rights outcomes, including a commitment to combatting modern slavery risks in our supply chains
- sourcing goods and services and engaging with suppliers who comply with all local and national laws and regulations including those related to occupational health and safety, non-discrimination, gender equity, environmental protection and the protection of human rights including modern slavery
- assessing the sustainability of the goods and services we purchase and where appropriate utilising sustainability criteria in awarding and renewing supply contracts.

We recognise that we deal with a wide range of suppliers of varying sizes, spread across a broad range of industry sectors. And a significant proportion of the goods and services we receive from our direct suppliers, are closely related to the professional services Urbis provides to our clients.

All our suppliers are requested to familiarise themselves, and conform, with the principles outlined in our Supplier Code of Conduct which you'll find attached. This extends to our suppliers adopting practices and procedures (and where possible supported by policies) to ensure they share in our commitments set out in the Code.



SUPPLIER CODE OF CONDUCT

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INTRODUCTION

The Urbis and Cistri group of companies ('Urbis Group') has set high standards for the way it conducts its business. The Urbis Group takes its role as an ethical and responsible business seriously and strives to ensure its suppliers and customers have clear expectations about the way the Urbis Group conducts business. The Urbis Group is committed to socially and environmentally responsible and sustainable procurement and acknowledges this responsibility extends beyond its own operations and into its supply chains.

PURPOSE AND SCOPE

This Supplier Code of Conduct ('Code') sets out the minimum standards of behaviour the Urbis Group expects of its suppliers, consultants, contractors, sub-consultants and sub-contractors ('Suppliers') and it applies to all Suppliers.

The Code seeks to apply the Urbis Group's core values to the procurement of goods and services in partnership with its Suppliers. It is based on the Responsible Business Alliance Code of Conduct 7.0 effective 1 January 2021, which is a set of social, environmental and ethical industry standards which has been prepared with reference to international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises and the standards of the International Organisation for Standardisation and Standards Australia.

Suppliers must at a minimum comply with all applicable local laws and regulations of the countries in which they operate. Where the Code goes further than local standards, Suppliers must adhere to the Code in a way that is appropriate. The Supplier must continue to comply with all obligations in any supply agreement with the Urbis Group and where those terms go further than the standards in this Code, the Supplier must continue to comply with the agreement terms.

Suppliers are also expected to:

- have read and understood the Code;
- take reasonable steps to communicate the Code to all its employees and amongst those sub-consultants, sub-contractors, agents and suppliers in their own supply chain with whom they engage in performing services and supplying goods to the Urbis Group ('Supply Chains'); and
- act consistently with the Code in carrying out their operations, implement the principles set out in the Code in their own Supply Chain and otherwise apply the Code in all dealings with the Urbis Group.

On request, the Urbis Group will provide Suppliers with guidance so that together the parties can strive for continual improvement in achieving the Urbis Group's ethical procurement goals.

OVERVIEW

Urbis Group's Code is made up of 7 sections:

- Business Ethics
- Labour, Human Rights and Non-Discrimination
- Health and Safety
- Environment
- Management Systems
- Supplier Compliance
- Raising Concerns & Contact

Those sections are set out in more detail on the following pages.



1. BUSINESS ETHICS

The Urbis Group expects the highest standards of ethical conduct in all of its endeavours. Suppliers are expected to be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

1.1 Business Integrity

The Urbis Group promotes integrity and ethics in all aspects of its activities and does not tolerate any form of corruption, extortion or embezzlement.

Suppliers must have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). Suppliers must never make or approve an illegal payment to anyone under any circumstances.

1.2 No Improper Advantage

Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of value to Urbis Group staff or representatives, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

1.3 Disclosure of Information

Suppliers will disclose all information regarding their labour, health and safety, environment practices, business activities, structure, financial situation and performance to the relevant authorities (governmental, statutory or otherwise) in accordance with all applicable laws and regulations. Falsification of records or misrepresentations of conditions or practices in the Supply Chain are unacceptable.

1.4 Conflict of Interest

Suppliers must make the Urbis Group aware of any actual or potential conflicts of interest that are relevant to Urbis Group's business. For example, the Supplier must declare if it believes one of the Urbis Group's employees or contractors has an interest or economic tie to the Supplier's organisation.

1.5 Intellectual Property

Intellectual property rights must be respected, and all use of technology, information and know-how must be conducted in a manner which promotes intellectual property rights and does not compromise the intellectual property of Urbis Group.

1.6 Fair Business, Advertising and Competition

The Urbis Group is committed to ensuring it conducts its business operations not only in full compliance with the law but also fairly and ethically. This extends to its commitment in ensuring compliance with anti-corruption and competition laws. Suppliers are expected to:

- not promise, give, request or agree to receive or accept any bribes or facilitation payments (including by way of inappropriate level of entertainment or anything of inappropriate value) in an attempt to sway a decision or gain a business advantage for the benefit of the Urbis Group or a client of the Urbis Group;
- not promise, offer or give any Urbis Group employee or representative any bribe, inappropriate level of entertainment or anything of inappropriate value; and
- promote free competition in all business activities including its advertising and promotion and not engage in anti-competitive conduct (including price fixing, bid rigging or misleading or deceptive conduct).

1.7 Data Protection and Privacy

The Urbis Group collects, uses, discloses and retains commercial information and personal information to the extent necessary for satisfying its business requirements in accordance with the law and contractual requirements.

Suppliers must not use or disclose any information belonging to Urbis Group, its existing and prospective customers, other suppliers, employees and other third parties ('Urbis Group Information'), except as required or authorised in writing by Urbis Group. Suppliers must comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Suppliers are expected to:

- use reasonable safeguards to protect Urbis Group Information against loss, theft, destruction and unauthorised access, use, alteration or disclosure;
- not access and use the Urbis Group Information other than for the legitimate purposes for which it was disclosed to the Supplier and otherwise in accordance the Supplier's contractual obligations owed to the Urbis Group;
- not retain Urbis Group Information beyond what is necessary or otherwise legally required to fulfil their obligations to the Urbis Group;
- employ appropriate cyber security measures within their IT systems to appropriately manage internal and external cyber threats;

- immediately advise the Urbis Group of any data breach or incident that may impact the Urbis Group Information and cooperate fully with the Urbis Group to resolve any impact; and
- protect the privacy of personal information obtained from those they do business with, including suppliers, customers, consumers and employees.

1.8 Responsible Sourcing of Material

Suppliers will use reasonable endeavours to assess and ensure materials are sourced from reputable manufacturers (and otherwise in compliance with any restrictions imposed by law) and will make their due diligence assessment measures available to the Urbis Group on request.



2. LABOUR, HUMAN RIGHTS AND NON-DISCRIMINATION

The Urbis Group is committed to nurturing a culture of diversity, inclusion, freedom of expression and non-discrimination that respects all human rights.

The Urbis Group expects Suppliers to similarly treat its workers and others with dignity, respect, trust and employ fairness and equity in all its dealings. Suppliers must be committed to upholding the human rights of its workers. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of worker.

All Suppliers must comply with applicable international and national laws and standards in relation to labour practices and human rights.

2.1 Voluntary Employment & Modern Slavery

Modern slavery is a term used to describe a range of extreme labour abuses and exploitative conduct including forced, bonded (including debt bondage) or indentured labour, servitude, slavery, forced marriage, deceptive recruiting for labour or services, trafficking of persons and child labour. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction or fraud for the purpose of labour or service.

The Supplier must not engage in modern slavery. There must be no unreasonable restrictions on workers' freedom of movement including unreasonable restrictions on entering or exiting facilities provided by the Supplier.

All work must be voluntary, with employees free to terminate their employment in accordance with established laws, regulations, and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.

Suppliers are expected to:

- take reasonable steps to source products and services free of modern slavery;
- take reasonable steps to promote the awareness of modern slavery risks within its operations and work with their Supply Chain to access, minimise and address modern slavery risks; and
- collaborate with the Urbis Group to manage modern slavery risks in its Supply Chain and on request provide the Urbis Group with data and other relevant information on the modern slavery risks in their operations and Supply Chains.

2.2 Child Labour & Young Workers

The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labour should not be used at any level of the Supply Chain.

Workers under 18 years of age, will not perform work that is likely to jeopardise their health or safety, including night shifts and overtime. Work must not interfere with their education or be harmful to their mental, social or moral development.

2.3 Working Hours

Working hours are not to exceed the maximum set by law. Workers must not be required to work more than the maximum hours per week stipulated by local law (in Australia this is 60 hours per 7-day week), including overtime, except in extraordinary business circumstances.

Workers will be allowed at least one day off every seven days. Overtime will be agreed, will not be excessive and will be compensated at the prevailing overtime rates.

2.4 Wages and Benefits

Compensation paid to workers must comply at a minimum with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Record keeping must be accurate and transparent. Workers must be provided with written and understandable information about their employment conditions before commencing employment and about their wage for each pay period. Workers must be compensated for overtime at pay rates that comply with local laws. Deductions from wages as a disciplinary measure or any deductions from wages not provided for by law shall not occur without the express permission of the worker concerned. Disciplinary measures should be recorded.

Other deductions for accommodation, meals, transport, or personal protective equipment should not exceed minimum costs.

2.5 Humane Treatment

Workers will be treated with dignity and respect. There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers – nor is there to be the threat of any such treatment.

Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to workers.

2.6 Freedom of Association and Collective Bargaining

Suppliers are to respect the rights of workers to lawfully associate freely or not to associate with groups of their choosing. Worker's representatives should be permitted to communicate openly with management regarding working conditions or have access to appropriate processes to address grievances without fear of harassment, intimidation, penalty, interference or reprisal.

Suppliers must recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choice. Suppliers must also respect and not interfere with, obstruct or prevent any associated legal right of workers such as the right to bargain collectively.

2.7 Labour Hire

Migrant workers, refugees and asylum seekers shall have the same entitlements as local workers as specified under local law. Migrant workers specifically recruited overseas must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin.

Any employers' or agents' recruitment fees or other related fees in connection with a worker's employment must be covered by the employer. If any such fees are found to have been paid by workers, they must be repaid within 90 days.

2.8 Anti-discrimination

Suppliers must not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices such as promotions, rewards and access to training. Suppliers must ensure that they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

Workers or prospective workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

2.9 Equality, Diversity and Community

Suppliers will promote a culture of enabling a supply chain that includes equality (including gender equity), diversity and actively support programs that look to ensure a diverse worker base. This includes our suppliers complying with gender equity laws.

Urbis Group will continue to, where possible, pursue a strategy of gender equity in procurement and Indigenous Procurement, including through its reconciliation action plan.

More broadly, the Urbis Group has genuine commitment to community engagement across a number of sectors. The Urbis Group seeks to engage Suppliers that share a passion for creating positive outcomes for local and international communities.



3. HEALTH AND SAFETY

The Urbis Group believes in putting the safety and wellbeing of people first. Every employee has the right to work in a safe and healthy work environment that is without risk to health, taking into consideration knowledge of the industry and any specific hazards. A safe and healthy work environment also enhances operational performance, increases morale and contributes to employee retention.

The Urbis Group expects all Suppliers to make proper provision for the health and safety of their employees, contractors, visitors and those in the community who may be impacted by their operations.

3.1 Occupational Safety

Suppliers are required to ensure worker exposure to potential health and safety risks and hazards (e.g. chemical or electrical hazards, fire, vehicles and fall hazards) are controlled through engineering and administrative controls, preventative maintenance and safe work procedures, personal protective equipment, and the provision of adequate and regular ongoing training and educational materials.

Procedures and process are to be in place to ensure the prevention, management, reporting, classification recording and tracking of occupational injury or illness. Procedures must encourage worker reporting, allow for provision of medical treatment, provide mechanisms for investigation and corrective action and facilitate the return of workers to work.

Workers should be encouraged to raise health and safety concerns and be empowered to refuse to work in unsafe conditions.

3.2 Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures are to focus on minimising harm to life, the environment and property.

3.3 Welfare

Suppliers must keep their workplace at a comfortable temperature, have adequate lighting and be suitably ventilated. Work sites must be adequately clean and hygienic and have sanitary food, preparation, storage and eating facilities. There must be clean drinking water, and clean toilet and washing facilities. Where Suppliers provide accommodation, it shall be clean, safe and meet the basic needs of workers.

3.4 Communication & Training

Suppliers must provide workers with appropriate, adequate, and regular ongoing workplace health and safety training, educational materials and related information about risks and hazards, including fire training, production safety, and correct use of protective equipment and first aid equipment. Clear safety warning signs, in the primary language of the workers, is to be displayed on relevant equipment and hazardous or toxic substances or objects.



4. ENVIRONMENT

To shape cities and communities for a better future, the Urbis Group aims to work with its Suppliers to promote sustainable economic growth, a healthy environment and mission fit communities and cities.

The Urbis Group recognises that sustainable economic development is dependent upon environmental protection.

To fulfil its long-term aspirations of zero harm to the environment, the Urbis Group is committed to continual improvement in its performance including the efficient use of natural resources, minimising waste and the increased use of clean energy.

The Urbis Group encourages its Suppliers to offer sustainable alternatives when supplying goods and services to enable the achievement of improved sustainability outcomes.

4.1 Environmental Permits and Reporting

Suppliers are to obtain, maintain and otherwise keep current all required environmental permits and registrations and ensure their operation and reporting requirements are followed.

4.2 Pollution Prevention and Resource Reduction

Suppliers are to ensure the efficient use of resources, and ensure that waste of all types, including water and energy, are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.

4.3 Waste Management

Suppliers will avoid undue and unnecessary use of material and use recycled materials whenever appropriate.

Suppliers will adhere to all applicable laws and regulations and customer requirements regarding the prohibition or restriction of specific substances including labelling for recycling and disposal.

4.4 Energy Consumption and Greenhouse Gas Emissions

Suppliers should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.



5. MANAGEMENT SYSTEMS

Suppliers will adopt or establish an appropriate management system, having regard to the nature of the services it provides to the Urbis Group and the content of this Code.

The management system should, at a minimum, contain the following elements:

5.1 Commitment to Continuous Improvement

A commitment to corporate social and environmental responsibility.

This may include the Supplier developing written performance objectives, targets and implementation plans to improve their social and environmental performance including communication with and training of managers and workers and a periodic assessment of the Supplier's performance in achieving those objectives.

5.2 Legal and Customer Requirements

A system to identify, monitor and understand applicable laws, regulations and customer requirements regarding corporate social and environmental responsibility. Adequate documentation and records to evidence regulatory compliance and that all licences to operate are to be in place.

5.3 Documentation and Records

A system whereby documents, and records are created and maintained to ensure regulatory compliance and conformity to company requirements, along with appropriate confidentiality to protect privacy.

5.4 Supplier's Responsibility

In addition to the above, develop a process to communicate those Code requirements relevant to its own suppliers and to monitor those suppliers' compliance to the Code. If any ethical or legal compliance issues arise that raise any questions, the Supplier has the responsibility to bring them forward.



6. SUPPLIER COMPLIANCE

The Urbis Group may verify the Supplier's compliance with the Code. Such verification may be conducted by way of a supplier self-evaluation or, where agreed, an audit by the Urbis Group (or an external resource designated by the Urbis Group) who may have a representative visit the Supplier's facilities with appropriate prior notice.

A Supplier's commitment to the principles contained in the Code is a criteria that will be taken into consideration in the Urbis Group's procurement decisions and in building ongoing relationships with Suppliers.

Whenever a situation of non-compliance is identified or a Supplier finds it difficult to undertake appropriate measures, this should be reported and shared with the Supplier's Urbis Group representative.



7. RAISING CONCERNS & CONTACT

To raise a concern, a supplier can send an email to: **info@urbis.com.au** (with 'Supplier Code of Conduct' included in the email subject line).

The Urbis Group will use its reasonable endeavours to ensure that all raised compliance issues with the Code are resolved quickly, fairly and at the proper level within the Urbis Group.

