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Growthpoint Properties
Supply Chain ESG Policy
Approved - November 2022

Document Title		Supply Chain ESG Policy		
Growthpoint Properties				
Approval	Name	Designation	Signature	Date
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1. Intent of this policy

1.1. This Supply Chain ESG Policy sets out the scope, roles, responsibilities, commitments and practical implications for Growthpoint Properties and its staff with regard to Growthpoint's Supplier Code of Conduct.

1.2. The Supplier Code of Conduct sets out Growthpoint's position and approach in a procurement context with regard to implementing its environmental, social and governance (ESG) values and commitments.

1.3. The intention of this policy and the Supplier Code of Conduct is to:

1.3.1. enable positive collaboration with suppliers to improve ESG performance over time; and

1.3.2. protect Growthpoint from reputational, legal, business and physical risks associated with poor ESG performance in its supply chain.

1.4. All engagements with suppliers on this topic should be undertaken in a constructive and positive manner.

1.5. Growthpoint's Procurement Team and ESG Team will continue to identify ways in which Growthpoint can provide additional awareness-raising and tools to support suppliers on this journey.¹

2. Growthpoint's commitment to the Supplier Code of Conduct

2.1. Growthpoint's Supplier Code of Conduct requires Growthpoint staff, in all interactions, legal agreements and monitoring arrangements with suppliers, contractors and service providers (collectively referred to as "suppliers"), to ensure adherence to the values and commitments contained in Growthpoint's ESG policies and procedures.

¹ Activities over the first 2 years could include: i) High-level ESG survey of suppliers, ii) Creating an awareness raising video to explain Growthpoint's approach and aspirations around ESG in the supply chain, and iii) showcasing examples of suppliers who have done really well, such as through case studies in newsletters and possibly awards for specific categories of E, S, and G performance. For instance, there could be a call for case study submissions once a year and winners can be mentioned in the annual report.

2.1. Growthpoint's Supplier Code of Conduct requires Growthpoint staff, in all their interactions, legal agreements and monitoring arrangements with suppliers, contractors, and service providers (hereafter collectively referred to as "suppliers"), to ensure adherence to the underlying values and explicit commitments contained in Growthpoint's ESG policies and procedures.

2.2. Staff who have direct dealings with suppliers in the procurement process and at any time during the lifespan of a supplier contract (hereafter referred to as "supplier-facing staff") are responsible for:

- 2.2.1. disseminating the Supplier Code of Conduct to suppliers and ensuring they commit to meeting its requirements;
- 2.2.2. reporting to the Procurement Team any cases of non-compliance that come to their attention; and
- 2.2.3. if requested by the Procurement Team, engaging with the suppliers in question to agree on a remedy (see section 4 on monitoring compliance and addressing non-compliance).

2.3. The following key paragraphs of the Supplier Code of Conduct refer:

2.3.1. “Growthpoint is committed to ensuring high standards of ethics and sustainability in relation to goods or services provided to Growthpoint, or to any activity undertaken as a licensee, distributor, representative or as one having similar rights.”

2.3.2. “To deliver best practice and drive sustainability performance, our suppliers, contractors, and service providers are required to comply with relevant Growthpoint policies and procedures, and with specific principles and standards set out in the Supplier Code of Conduct.”

2.4. In doing so, the following additional guidelines assist Growthpoint staff in knowing what is required from them in practical terms.

3. Requirements of supplier-facing staff

3.1. Staff involved in frontline procurement work (i.e. involving direct collaboration with suppliers) are responsible for onboarding suppliers to the Supplier Code of Conduct through the following critical steps.

3.2. As a first step, supplier-facing staff are required to read this Supply Chain ESG Policy and the Supplier Code of Conduct thoroughly and confirm, via formal signing, that they have read and understood both documents.

3.3. For all new procurement engagements as of the date of first adoption of this policy, supplier-facing staff must:

3.3.1. Ensure that suppliers read and confirm their commitment to meet the requirements of the Supplier Code of Conduct prior to completing any new procurement agreements or initiating work that is not covered by a procurement agreement. This task is completed by receiving a signed copy of the Supplier Code of Conduct from the supplier.

3.3.2. Undertake due diligence of ESG compliance of suppliers in line with the level of risk and the size of the supplier contract. See Annex II for due diligence checklist/questions.

3.3.3. If a procurement agreement is signed with the supplier, ensure that it includes clauses related to the enforcement of, and compliance with, the Supplier Code of Conduct. This should include Growthpoint’s right to terminate the contract should a

serious breach be confirmed by Growthpoint and not appropriately remedied by the supplier.

3.4. If a supplier does not yet comply with the Supplier Code of Conduct prior to signing a procurement agreement, an action plan must be included in the procurement contract, setting out a timeline and agreed-upon actions.

3.5. For service providers without contracts, the supplier-facing staff member must agree in writing with the supplier how any gaps will be addressed in order to comply with the Supplier Code of Conduct. This may be done by email and copied to the Procurement Team. The Growthpoint staff member must follow up to ensure that the agreed actions are taken and notify the Procurement Team when compliance has been achieved.

3.6. Supplier-facing staff must ensure that suppliers are made aware of the appropriate channels to raise a grievance or provide notification of non-compliance (see section 5).

3.7. Supplier-facing staff must recuse themselves from any interactions, dealings or negotiations should the supplier be, or have in its employ, a member of their immediate family (as defined by Growthpoint in its leave policy).

3.8. The specific profiles of suppliers will be considered with regard to their obligations as reflected in supplier agreements. This includes the size of the supplier, the nature of their operations, and the nature of the contract with Growthpoint. See Annex I for indicative expectations of different categories of suppliers.

3.9. At this time, Growthpoint staff are not required to undertake additional monitoring to ensure that suppliers meet their obligations with respect to the Supplier Code of Conduct.

4. Monitoring compliance and addressing non-compliance

4.1. The onus is on suppliers to comply with the Growthpoint Supplier Code of Conduct and to manage their compliance in accordance with principles of transparency and integrity.

4.2. During the supplier onboarding process, Growthpoint may choose to request specific evidence of key policies and management systems. Requests for evidence are at the discretion of the supplier-facing staff members and the Procurement Team. Annex II provides possible questions for due diligence.

4.3. Growthpoint may also include specific reporting responsibilities and metrics in supplier agreements on a case-by-case basis and in line with the nature of the supplier and the agreement. Growthpoint will adopt a phased approach to introducing metrics for monitoring supplier ESG performance. See Annex III.

4.4. Growthpoint may rely on recognised certification schemes as a proxy for supplier compliance. Growthpoint also reserves the right not to accept a specific certification if it does not fulfil its requirements.

4.5. Growthpoint will not actively audit suppliers at this stage. Instead, Growthpoint currently relies on reports of non-compliance from suppliers, Growthpoint staff, or the public.

4.6. If a notification of non-compliance is received, Growthpoint will initiate an investigation, which will consist of the following steps:

4.6.1. Log the notification of potential non-compliance in the Growthpoint Supplier Code of Conduct Non-Compliance Register, which is available at the following link: [insert link to spreadsheet on Growthpoint intranet].

4.6.2. Agree with the Procurement Team who will take the process forward with the supplier, in line with the nature of the business relationship. This person will be responsible for the following further steps:

4.6.3. Send a formal email to the supplier setting out the notification that has been received and its contents (unless the notification was received from the supplier). If requested by the original notifying party, their identity will be kept anonymous.

4.6.4. Request information from the supplier about the alleged non-compliance, allowing the supplier to explain further or contest the allegation and provide supporting evidence. The supplier should be given two weeks to respond, after which Growthpoint will either confirm non-compliance or close the case.

4.6.5. If the non-compliance is confirmed, invite the supplier to set out what steps will be taken to remedy the non-compliance and over what timeframe. The supplier should propose a remedy within one month after the non-compliance is confirmed.

4.6.6. Confirm the agreed remedy in writing with the supplier and ensure that this is added to the supplier documentation folder and the Growthpoint Supplier Code of Conduct Non-Compliance Register, with a due date for implementation. The remedy should be agreed upon and documented within one month of receipt of the supplier's proposal. The agreed remedy should be implemented within six to twelve months after the agreement is reached. Alternative timeframes may be agreed upon depending on urgency and supplier capacity.

4.7. If a supplier is in serious breach of the Supplier Code of Conduct and will not commit to remedying the non-compliance within a suitable time period, an internal deliberation phase will be triggered to determine whether the contract should be terminated. The internal deliberation phase will consist of the following steps:

4.7.1. The Procurement Team will send a formal notification to Growthpoint's Compliance Officer that a supplier is in serious breach of the Supplier Code of Conduct and that there has been a failure to agree on a suitable remedy. Reference should be made to the definition of a serious breach in section 3.

4.7.2. A Review Panel of three staff members will be established to review the case, comprising one representative from Procurement, one from the ESG Team and one from the Ethics Committee. The review will include:

- 4.7.2.1. the details of the non-compliance;
- 4.7.2.2. evidence provided by the supplier; and
- 4.7.2.3. efforts by the supplier to contribute to a remedy.

4.7.3. The Review Panel will determine whether the case is serious enough to require termination of the contract or whether a warning can be issued.

4.7.4. The Review Panel will compile minutes of its discussion and recommendations and share these with the Procurement Team.

- 4.7.5. The Procurement Team will notify the supplier of the outcome of the review.
- 4.7.6. The Procurement Team will update the Growthpoint Supplier Code of Conduct Non-Compliance Register and inform Growthpoint's Compliance Officer.
- 4.7.7. Information on the case and its outcome will be provided to the Social, Ethics and Transformation Committee at its next meeting.

5. Channels for notification of supplier non-compliance

- 5.1. Notifications of supplier non-compliance with the Supplier Code of Conduct can be submitted by any party, including Growthpoint staff, the suppliers themselves, and any member of the public.
- 5.2. Growthpoint staff should submit their notification directly to the Procurement Team via suppliercompliance@growthpoint.co.za and copy scc@growthpoint.co.za.
- 5.3. Suppliers should submit their notification directly to their immediate contact points at Growthpoint or to the Procurement Team via suppliercompliance@growthpoint.co.za and copy scc@growthpoint.co.za.
- 5.4. Members of the public may submit their notifications via:
 - 5.4.1. Growthpoint's whistle-blower hotline on **0800 167 463** or growthpoint@tip-offs.com; or
 - 5.4.2. directly to suppliercompliance@growthpoint.co.za, copying scc@growthpoint.co.za.
- 5.5. Information on the Supplier Code of Conduct and channels for raising grievances or notifying Growthpoint of non-compliance should be easily accessible:
 - 5.5.1. on Growthpoint's website;
 - 5.5.2. in supplier agreements; and
 - 5.5.3. at site level, including through visible signage, documentation and/or in-person briefings.
- 5.6. Supplier-facing staff should also identify whether additional support is required from Growthpoint to assist the supplier in remedying non-compliance.

6. Working collaboratively with suppliers

- 6.1. Growthpoint aims to reduce business risk and strengthen performance for both Growthpoint and its supply chain through this Supply Chain ESG Policy and the Supplier Code of Conduct.
- 6.2. Growthpoint understands that many suppliers will not have comprehensive ESG systems in place, and some may only be starting out on their ESG journeys.
- 6.3. Growthpoint therefore aims to work collaboratively with suppliers over time to raise awareness about the importance of ESG considerations.
- 6.4. Growthpoint therefore commits to:
 - 6.4.1. constructive dialogue with suppliers about ESG performance and improvements;
 - 6.4.2. having reasonable expectations; and
 - 6.4.3. providing information and developing resources and tools over time to assist suppliers in meeting their expectations.

7. Responding to questions and grievances

7.1. As suppliers adapt to the requirements of the Supplier Code of Conduct, they may have questions, concerns or suggestions.

7.2. The Procurement Team welcomes feedback and suggestions on how supplier ESG engagement can be improved. These may be emailed to suppliercompliance@growthpoint.co.za, copying scc@growthpoint.co.za.

7.3. Suppliers or other stakeholders may submit a complaint or grievance in relation to the Supplier Code of Conduct, or any other matter, via Growthpoint's anonymous whistle-blowing hotline on **0800 167 463**.

7.4. Questions or complaints specifically related to the Supplier Code of Conduct may also be directed to Growthpoint's Procurement Team via suppliercompliance@growthpoint.co.za, copying scc@growthpoint.co.za.

7.5. Supplier-facing staff must forward all questions, concerns or suggestions to the Procurement Team for timely processing and response.

Annex I. Indicative tiered expectations of suppliers

Supplier size	Policies and Systems	Staff allocation
Large suppliers with multi-year and/or national contracts with Growthpoint	<p>Policies and systems are in place to ensure compliance with all parts of the Growthpoint Supplier Code.</p> <p>Initiatives are in place to go the extra distance on environmental and social performance, including ESG targets selected by the supplier.</p>	At least one full-time staff member appointed to manage ESG performance and ensure compliance with the Supplier Code of Conduct.
Medium-sized suppliers with occasional contracts with Growthpoint	Systems are in place to manage and ensure minimum compliance with i) environmental regulations, ii) Growthpoint's Human Rights Position Statement, and iii) Growthpoint's Business Code of Ethics	At least one or more staff members have a portion of their time allocated to managing ESG performance and ensuring compliance with the Supplier Code of Conduct.
Small and micro suppliers who provide ad hoc services to Growthpoint	Supplier acknowledges, understands, and signs Growthpoint Supplier Code of Conduct to indicate a commitment to comply with all requirements.	Supplier designates one staff member to monitor its compliance with Growthpoint Supplier Code

Annex II. Due diligence questions

Corporate governance and ethical business practices

- Does the supplier have policies and systems in place to make sure it is compliant with national laws and regulations?
- Do these systems address ethical behaviour, anti-bribery, anti-corruption, whistleblowing, and other relevant business practices?
- Are employees adequately informed about these policies, for example through an employee handbook and training?

Modern slavery, labour practices and human rights policies

- Has the company explicitly included a commitment to human rights and the ILO Core Labour Standards in its human resources policies and training?
- Do HR policies and training cover:
 - a safe workplace;
 - freedom from direct or indirect discrimination, harm, intimidation, harassment, or fear;
 - diversity and equal opportunity in recruitment;
 - prevention of forced, bonded, or compulsory labour, slavery, or human trafficking;
 - zero tolerance for the threat of physical or other punishment, or the physical, sexual, or psychological abuse or inhumane treatment of workers or members of the community;
 - prevention of child labour;
 - freedom of association and collective bargaining;
 - managing human rights and labour practices in the supplier's own supply chain; and
 - the ability for staff and suppliers to raise grievances or complaints (including an anonymous reporting option), together with a clear explanation of how grievances will be addressed.
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Wages, benefits and working hours

- Does the supplier have an employee handbook, induction training, or related policies to ensure fair labour practices and compliance with national regulations, including coverage of:
 - remuneration and benefits;
 - minimum wages;
 - overtime;

- superannuation;
- leave entitlements and other benefits; and
- timely payment of workers?
- Does the supplier provide clear information to employees on its labour practices prior to employment?
- Does the supplier provide workers with appropriate training to perform their duties and comply with these guidelines?

Occupational health and safety

- Does the supplier have an occupational health and safety (OHS) officer, committee, staff training, and/or robust systems in place to ensure:
 - compliance with relevant local and national occupational health and safety laws and regulations;
 - a safe and healthy working environment to prevent incidents and injuries;
 - that employees can refuse a work situation if they reasonably believe it presents an imminent and serious risk to their health and safety; and
 - that all work premises are checked daily to maintain fire safety and hygiene standards?

Environment

- Does the supplier have a dedicated environmental officer or sustainability officer, environmental or sustainability policy, committee, and/or training in place to ensure:
 - compliance with all relevant environmental legislation in the national and local jurisdictions in which it operates; and
 - greater efficiency in the use of energy, waste, materials, and water, appropriate to the nature and scale of its business services?
- Does the supplier have a formal environmental and social management system (ESMS)?
- Does the supplier have initiatives in place to support the circular economy by:
 - eliminating waste and pollution;
 - circulating products and materials through reuse, repair, refurbishing, and recycling for as long as possible; and
 - designing products and processes for durability, reuse, and recyclability?
- Does the supplier have any impacts on biodiversity or ecosystems through its operations, services, or products?
 - If yes, are policies and systems in place to reduce risks and enhance positive outcomes?

- In what ways is the supplier likely to be affected by climate change, for example through:
 - extreme weather;
 - drought;
 - floods;
 - supply chain disruption; or
 - changes in technology standards or other regulations?
- Does the supplier contribute to climate change in any significant ways, for example through greenhouse gas emissions?
- Has the supplier assessed its contribution to climate change and its exposure to climate-related risks?
- Are initiatives in place to mitigate and adapt to climate change, and are these driven or supported by the board or management?

Community and stakeholder engagement

- Who are the supplier's key stakeholders, for example employees, business partners, communities, and customers?
- Does the supplier understand the value of engaging effectively with these stakeholders, and which channels are currently used?
- Has the supplier made any changes in response to stakeholder feedback?
- Is there a visible and accessible mechanism for stakeholders to raise complaints or grievances, including through an anonymous channel?
- Are there initiatives in place related to:
 - skills development;
 - urban renewal projects;
 - educational and health-related projects; or
 - other social projects?

Annex III. Considerations for future monitoring

The following indicators could be suggested for monitoring purposes, to be phased in over time and according to the size of the supplier businesses.

Supplier size	Year 1	Year 2	Year 3
Large suppliers with multi-year and/or national contracts with Growthpoint	Statement of compliance with the Supplier Code of Conduct	i) Description of any environmental or social initiatives and associated outcomes ii) Description of any low-carbon initiatives and associated outcomes (e.g., renewable energy generated, GHG reduced.)	i) Total GHG emissions ii) Renewable energy generated ii) Women employed iii) % waste recycled iv) Water use efficiency
Medium-sized suppliers with occasional contracts with Growthpoint	Statement of compliance with the Supplier Code of Conduct	i) Description of any environmental or social initiatives and associated outcomes	i) Women employed ii) % waste recycled
Small and micro suppliers who provide ad hoc services to Growthpoint	Statement of compliance with Supplier Code of Conduct	i) Description of any environmental or social initiatives and associated outcomes	i) Women employed ii) % waste recycled

Signed at Durban on this day 03 of June 2026.

Designated Signatory:

Signature

Garreth Burn

Full Name