

Sustainable Procurement Policy

1. INTRODUCTION

This is the Sustainable Procurement Policy ("**Policy**") for Stoddart Group Pty Ltd ACN 010 744 751 and its subsidiaries and associated entities (collectively, "**Stoddart Group**," "**we**," "**our**").

2. APPLICATION

This policy applies to all Stoddart Group suppliers, contractors, and subcontractors (collectively, "**Suppliers**") (both current and prospective) across all areas of our operations.

This policy is an integral part of our overarching sustainable procurement framework and is intended to be read in conjunction with our Modern Slavery Statement, which is published annually.

All Suppliers are expected to comply with this Policy, as well as our other policies.

3. OBJECTIVE

The objective of this Policy is to align our procurement needs with our goals and objectives to create a culture of efficiency, accountability, and sustainability consistent with community expectations.

4. ACKNOWLEDGEMENT

We acknowledge that our procurement decisions have a social and environmental impact, both domestically and abroad, and we recognise that we have the ability to influence and support sustainable procurement practices.

For this reason, we are guided by the sustainable procurement practices outlined in the International Standard for Sustainable Procurement – Guidance (ISO 20400).

5. OUR PRIORITIES

Stoddart Group strives to lead by example by conducting its procurement practices in a manner which demonstrates efficiency, probity, and social and environmental responsibility.

With the engagement and cooperation of our Suppliers, we are committed to:

- (a) maintaining (and further improving) efficient procurement practices;
- (b) practicing corporate responsibility and ethical business practices;
- (c) complying with (and ensuring that our Suppliers comply with) all applicable environmental laws and standards; and
- (d) responsible employment practices and identifying any risks of modern slavery in our supply chain.

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Each of these priorities are outlined in further detail below.

Efficiency

Stoddart Group is committed to embracing efficiency in its supply chains.

We encourage our Suppliers to conduct their business in an efficient manner by:

- (a) avoiding resource misuse and unnecessary purchases;
- (b) minimising waste disposal; and
- (c) identifying areas for innovation and improvement in their current processes.

Ethical business practices

Stoddart Group is committed to adhering to ethical business practices.

Suppliers are expected to comply with all applicable laws (wherever they might operate) and are to refrain from engaging in unethical business practices, which include, by way of example:

- (a) money laundering;
- (b) fraud, bribery, or corruption;
- (c) conflicts of interest; and
- (d) misuse of intellectual property.

Environment

Stoddart Group is committed to acting in an environmentally responsible manner.

Suppliers are expected to comply with all environmental laws and standards (wherever they might operate). Suppliers should:

- (a) have in place responsible waste management and disposal practices;
- (b) wherever possible, take the initiative to reduce their carbon footprint and seek to minimise the effect of pollutants created in their production process; and
- (c) have in place a plan to manage (and where possible, mitigate) the environmental impact of their operations.

Responsible employment practices and modern slavery

Stoddart Group is committed to responsible employment practices and has a zero-tolerance approach to modern slavery in its supply chains.

We have implemented measures to minimise the risk of modern slavery in our supply chain, which are detailed in our Modern Slavery Statement.

Suppliers are expected to comply with these measures and will actively take steps to identify risks in their own supply chains.

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4. OUR SUPPLY CHAIN

Stoddart Group sources materials and products from an international and national network of key Suppliers, through a careful and considered screening process.

We are committed to working alongside our Suppliers to promote sustainable procurement practices (and, where possible, to improve upon these practices).

We will continue to work collaboratively with our Suppliers to foster mutually beneficial relationships, while educating and encouraging our Suppliers to improve upon existing processes in a manner that promotes sustainability.

We also encourage our Suppliers to work with us from time to time to give back to the community through community initiatives.

Knowledge sharing is important to us. We listen to our Suppliers and invite and indeed encourage feedback regarding our processes.

5. CONTINUOUS IMPROVEMENT AND OUR ONGOING COMMITMENT

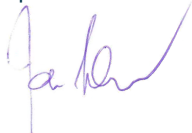
Sustainable procurement involves every aspect of our supply chain and is a process of continuous improvement. While our Suppliers may vary in terms of their size and structure, we recognise the integral role that each Supplier plays as part of this process.

As part of our commitment to continuous improvement, we will be:

- (a) bolstering our screening process for prospective Suppliers;
- (b) implementing Supplier reporting requirements;
- (c) implementing education and training for our leadership team, managers, contractors, and employees (with a focus on those responsible for procurement) to identify and report any risks of modern slavery in our supply chain; and
- (d) establishing mechanisms for Suppliers to provide feedback or raise grievances.

Our procurement plan will be reviewed and updated periodically.

This Policy has been approved and endorsed by the board of management of Stoddart Group.



Jon Stoddart
Governing Director
Stoddart Group

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