

Supplier Code of Conduct

1. Purpose

At Dexus, we acknowledge that suppliers are essential partners in delivering the places, services and outcomes that create long-term value for our investors, customers and communities. The decisions we make together across our supply chains have real impacts on people, the environment, and the communities in which we operate.

This Supplier Code of Conduct outlines Dexus's principles, commitments, and approach to responsibly source products and services, and the standards we expect of our suppliers, and others engaged within our supply chain in respect to the following risk areas;

1. People and Wellbeing
2. Human Rights and Enhancing Communities
3. Climate and Environment
4. Risk and Security Management
5. Governance, Ethics and Transparency
6. Performance and Value

This Supplier Code of Conduct aims to encourage, support and, where appropriate, mandate requirements that help Dexus and our suppliers work towards a safe, sustainable and equitable future for all. Dexus is committed to working with our suppliers to minimise any potential negative impacts in our supply chain, and we will aim to ensure that all suppliers understand their responsibilities under this Code of Conduct.

2. Application

This Supplier Code of Conduct applies to all suppliers, consultants, contractors, and Supplier Personnel (including employees, labour-hire workers, and sub-contractors), across all tiers of Dexus's supply chain, within Dexus's direct operations and business activities, where we have operational or financial control, and should be read in conjunction with the following policies, which are publicly available at dexus.com;

- Work Health Safety and Wellbeing Statement
- Human Rights Policy
- Anti-Modern Slavery Management Framework,
- Environmental Policy and Statement,
- Biodiversity Procedure,
- Climate Transition Action Plan,
- Privacy Policy,
- Anti Bribery and Corruption Policy, and
- Whistleblower Policy

3. Approach

This Supplier Code of Conduct is designed to communicate the following for identified risk areas within our supply chain;

- Dexus's commitments for each identified risk area;
- Minimum performance requirements for our Suppliers, which are attested to annually, to address those identified risk areas, and,
- Communicate preferred standards, which signal to suppliers, our expectations with respect to best practice and continuous improvement. These criteria will be included in our evaluation of supplier quotes, proposals, or submissions for work with Dexus in line with our Procurement Policy, and Procurement Excellence Method.



4. Commitments, Requirements, and Preferred Standards

People and Wellbeing

Work, Health and Safety

Dexus is committed to and expects our suppliers to contribute to providing a safe work environment, healthy working conditions, and safe systems of work, for the wellbeing of all supplier personnel. This includes the management of physical and psychosocial health, safety, in accordance with our Work, Health, Safety and Wellbeing Statement.

Minimum Supplier Requirements	Preferred Supplier Standards
- Suppliers to comply with all applicable Work Health and Safety legislation in every jurisdiction in which they operate, to ensure a safe and healthy workplace. - Maintain and implement a documented WHS Policy and management system applicable to your employees and sub-contractors, to ensure that; • The physical and psychosocial wellbeing of supplier personnel, with appropriate instruction, training, development and supervision. • Psychosocial hazards (including workplace stress, bullying, discrimination, harassment, vilification, and fatigue), are managed in accordance with the model psychosocial regulations in force in each jurisdiction. • All Supplier personnel hold verified competencies (ie trade licences, tertiary qualifications, or mandatory govt checks such as construction white card, or working with children checks), as applicable for their role. • All Supplier personnel are trained to identify and manage workplace risks, hazards or improvement opportunities, and report incidents without fear of reprisal. • All Supplier personnel have opportunity to provide feedback, and contribute to continual improvement of the WHS management system. • An effective Return to Work policy which promotes early, safe and durable return to gainful and meaningful employment, is in place for any injured workers. - Prior to work being conducted at a Dexus Managed property, comply with Dexus's Work Health and Safety System, and ensure all Supplier personnel complete all Dexus inductions and pre-qualification requirements, conduct pre-start risk assessments, have appropriate personal protective equipment, and obtain all required permits to work. - Report all workplace incidents, near-misses, safety hazards or improvement opportunities to Dexus without unreasonable delay. Suppliers must also immediately notify Dexus of any notifiable incident, dangerous incident, serious injury, regulator investigation, improvement notice or prohibition notice associated with work performed for Dexus.	- Maintain Certification to ISO 45001 (Occupational Health and Safety Management) - Periodically report on safety performance metrics, including lead and lag indicators and trends analysis, to Dexus, and demonstrate initiatives to promote continuous improvement in safety performance, and achievement of best practice. - Proactively share safety learnings and innovations with Dexus that could benefit our broader supply chain and further enhance a culture of safety. - Maintain policies which provide and promote mental health support through Employee Assistance Programs. - Maintain policies, implement programs and provide awareness training to all personnel, to recognise and respect Diversity, Equity and Inclusion, which values individuals regardless of their gender, marital or family status, sexual orientation, gender identity, age, disability status, ethnicity, religious beliefs, cultural background, country of origin, socio-economic background, perspective and experience. - Upon a reasonable request by Dexus, provide disclosure of any findings against the Supplier or its Directors, with respect to Work Health Safety legislation or regulations, with lessons learnt, and subsequent corrective actions.



Fair Work

Dexus is committed to and expects our suppliers to ensure all supplier personnel receive fair wages for fair work undertaken, in accordance with the relevant industrial instruments applicable in each jurisdiction.

Minimum Supplier Requirements	Preferred Supplier Standards
- Suppliers are to comply with all applicable industrial instruments, including the Fair Work Act 2009 (Cth), relevant Modern Awards (including applicable National Employment Standards), and any applicable Enterprise Agreements, to ensure all supplier personnel receive their lawful minimum wages, penalty rates, allowances, and entitlements. - Ensure directly employed Supplier Personnel have written employment contracts confirming the applicable employment terms, and Supplier has appropriate process to confirm rights to freedom of association, collective bargaining, and union membership, to ensure employees can safely organise and participate in these committees without fear of retribution. - Maintain time-and-wages records for all supplier personnel in the form and for the period required by applicable workplace law. Maintain payroll controls processes sufficient to detect and remediate unintentional underpayment of wages, overtime, or entitlements. Where underpayments are identified, rectify and back-pay affected workers without unreasonable delay, and report any material underpayments events, relevant to services provided to Dexus. - Ensure all eligible supplier personnel receive superannuation contributions in accordance with the Superannuation Guarantee (Administration) Act 1992 (Cth), paid on time and to a complying fund. - Have policies and controls in place to prevent misclassification of supplier personnel as independent contractors (where relationship is substantive employment). - Ensure all supplier personnel engaged in delivering services to Dexus hold a lawful right to work in the relevant jurisdiction, and Suppliers maintain records verifying work rights (including visa conditions and any restrictions) for the period required by applicable law.	- Conduct periodic independent third-party payroll audits covering award classification, penalty rates, and entitlements; provide Dexus with a summary of findings and remediation actions on request. - Pay consideration to paying above applicable award minimums, including participation in industry benchmarking or recognition schemes (e.g. Fair Wages Accreditation, Living Wage Foundation equivalent). - Have policies and programs in place to attract, retain, recognise, reward and develop supplier personnel. - Have policies and programs in place to monitor minimum standards and identify and manage worker vulnerability factors. - All supplier personnel receive plain language information on work conditions, wages, entitlements, safety, induction, worker rights and complaints channels, and these are available in languages applicable to the supplier's workforce, where reasonably practical to do so. - Positively contribute to healthy work-life balance for supplier personnel through flexible working and a focus on wellbeing. - Maintain transparency with respect to labour-hire, and disclose all labour-hire arrangements used in the delivery of Dexus services.

Human Rights and Enhancing Communities

Modern Slavery and Human Rights

Every person has the right to live a life that is free from fear, harassment and discrimination, and to have their human rights respected. Dexus is committed to respecting internationally recognised human rights and to identifying and managing modern slavery risks across our supply chain, including where our supply chains extend outside Australia and New Zealand. We expect our suppliers to do the same, proportionate to their size, operations and risk exposure. Our approach is set out in the Dexus Human Rights Policy and Anti-Modern Slavery Management Framework.



Minimum Supplier Requirements	Preferred Supplier Standards
- Comply with the Modern Slavery Act 2018 (Cth) and all applicable modern slavery and human rights legislation in the jurisdictions in which they operate. - Have procedures in place which provide effective employee feedback, grievance, or confidential whistleblower channels, so that workers experiencing harm or exploitation are supported without fear of retaliation. - Respect internationally recognised human rights, as outlined in Dexus's Human Rights Policy, including those set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. - Do not engage in, or benefit from, any form of modern slavery, including: • Child labour, forced labour, human trafficking, debt bondage, or servitude. • Coercive or deceptive recruitment practices. • Retention of identify or travel documents. • Wage theft or withholding of entitlements. • Unsafe or degrading conditions. - Take proportionate steps to identify and assess modern slavery risks in their operations and supply chains, having regard to the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance for Responsible Business Conduct, and the ILO Indicators of Forced Labour. - Pay particular attention to the treatment of workers who may be more vulnerable to exploitation, including migrant workers and workers engaged through labour-hire arrangements.- Agree to work collaboratively with Dexus, and other relevant parties, (where reasonably requested), to mitigate and remediate any instances of modern slavery at no cost to affected workers, and if made aware of any actual or suspected incident of modern slavery within its operations or supply chain, notify Dexus without unreasonable delay. - Where requested by Dexus, participate in requests for information, questionnaires or audits (by Dexus or an independent third party) to support Dexus's own Modern Slavery Reporting, and where harm is identified, work with Dexus and other relevant parties to provide or enable remedy.	- Have policies and programs in place to procure goods and services responsibly, and avoid purchasing products or services at high risk of being produced using forced, bonded, involuntary, or child labour. - Where supplying goods or services in categories recognised as higher-risk for modern slavery (including cleaning, security, facilities management, construction and construction materials, textiles and uniforms, electronics and IT hardware, solar PV, and PPE), apply proportionate due diligence to those inputs, and be able to demonstrate their origin and the steps taken to manage modern slavery risk. - For cleaning services, work towards pre-qualification under the Cleaning Accountability Framework (CAF). - Participate in a recognised social compliance audit or verification scheme appropriate to your goods or services — for example, EcoVadis, Sedex, SMETA, amfori BSCI, SA8000, Responsible Business Alliance (electronics), or Fair Wear Foundation (textiles). - Publish a Modern Slavery Statement (or voluntary equivalent) to disclose their approach to modern slavery and human rights, including risk management actions, incidents, and corrective actions. - Provide modern slavery and human rights awareness training to all personnel, especially those involved in procurement, recruitment and supervision of labour hire. - Have policies, procedures and training in place for key personnel to recognise signs of worker vulnerability, cultural safety concerns, mental health, gender-based violence, coercion or overwork.

Enhancing Communities

Dexus operates in and alongside communities where our customers, tenants and neighbours live and work. Dexus is committed to creating positive social value through our assets in those communities and expects our suppliers to act respectfully and constructively when working with, or in proximity to, them.



Minimum Supplier Requirements

- When delivering services to Dexus, act respectfully towards our customers, tenants, neighbours and the wider community, and take reasonable steps to minimise any negative impacts of their activities (for example, noise, traffic, disruption, waste, or safety impacts) on those communities.
- Promptly address any complaints or concerns raised by community members, customers, tenants or neighbours that arise from the supplier's activities and cooperate with Dexus to resolve issues.
- Where practicable, source labour, goods and services locally to the communities in which the services are delivered.
- Where relevant to the services provided, respect Aboriginal and Torres Strait Islander cultural heritage, sites and values, and comply with all applicable cultural heritage laws and requirements.

Preferred Supplier Standards

- Support supplier personnel to participate in community activities, for example through volunteering, skills-based support or in-kind contributions.
- Where relevant and commercially viable, identify opportunities to include Supply Nation certified businesses, B Corp certified organisations, social enterprises, or other recognised third-party certified providers in their own supply chain for the goods and services provided to Dexus.
- Demonstrate a commitment to Reconciliation with Aboriginal and Torres Strait Islander Peoples, in a form appropriate to the size and nature of your business. This might include a Reconciliation Action Plan, Supply Nation membership, or measurable First Nations procurement or employment activity.
- Participate in community partnerships or provide donations or support to charities, community organisations or social enterprises.
- Support fair access to employment and procurement opportunities, including for people from under-represented groups (for example, First Nations peoples, people with disability, refugees or people facing barriers to work).

Climate and Environment

Climate Action & Environmental Responsibility Sourcing

Dexus is committed to protecting the environment and reducing greenhouse gas emissions across our value chain, in line with our Environment Policy and our aspiration of net zero by 2050. Suppliers play an important role in helping Dexus meet these commitments and are expected to manage their own environmental impacts responsibly, proportionate to the nature and scale of the goods or services they provide.

Minimum Supplier Requirements

- Comply with all applicable environmental legislation, regulations, licences and permits in the jurisdictions in which they operate, including (without limitation) the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)*, State and Territory environment protection legislation, and equivalent NZ legislation (including the *Resource Management Act 1991 and successor legislation*).
- Maintain an environmental management approach, proportionate to the nature and scale of the goods or services provided, covering energy and emissions, waste, water, and materials.
- Identify and implement reasonable opportunities to improve energy efficiency and reduce operational emissions.

Preferred Supplier Standards

- Maintain an Environmental Management System (EMS) certified against ISO 14001, which provides the primary framework for identifying, managing and monitoring environmental risks, opportunities and impacts.
- Commit to a zero-carbon future, and set, publicly disclose, and report on emissions reduction targets, aligned with science-based methodologies (e.g. SBTi-aligned) covering Scope 1, 2 and relevant Scope 3 categories.
- Source 100% of electricity needs from renewable sources, and/or have decarbonised their operations, and where offsetting residual emissions, use only traceable, and verifiable, high-quality carbon offsets.



- Where transporting goods, equipment or personnel to deliver services to Dexus, comply with all applicable vehicle emissions and fuel standards. - Identify and implement opportunities to reduce water consumption and waste generation. - Manage and dispose of all waste generated in the course of delivering services to Dexus in accordance with applicable waste management legislation, and support Dexus's waste diversion and circular economy objectives by avoiding landfill disposal where technically and commercially practical alternatives exist. - Where possible, prioritise products designed for disassembly, reuse, recycled content, or supported by a product stewardship or take-back scheme. - Do not use, handle, store or dispose of hazardous substances, chemicals or controlled materials except in accordance with applicable law, including safe handling, labelling, and disposal requirements. - Comply with all applicable product stewardship obligations. For suppliers providing goods, materials, fit-out, or construction-related services, comply with all applicable bans and controls on restricted or high-risk materials, such as: • Asbestos Containing Materials, • Engineered Stone containing silica, • Ozone-depleting substances, • PFAS, • Combustible façade materials, • Products which contain toxic chemicals that may result in air or water pollution. - Comply with any Dexus site-specific biodiversity requirements notified to the supplier, and take all reasonable steps to prevent environmental harm (including spills, contamination, and damage to vegetation, waterways, habitat, or protected species) while working on or in connection with Dexus managed properties. Report any environmental incident to Dexus without unreasonable delay. - Where requested, support Dexus's performance against recognised building, sustainability and disclosure ratings schemes, where relevant to the goods or services provided, including: • NABERS Rating Scheme • Green Star (Buildings, Fitouts, and Performance) • WELL Certifications • Dow Jones Best-in-Class Index (formerly DJSI) • Global Real Estate Sustainability Benchmark (GRESB) - Ensure all supplier personnel, agents, sub-contractors, and service providers are aware of the impact of their actions on the environment and use reasonable endeavours to ensure that they are	- Demonstrate year-on-year reductions in operational emissions intensity. - Transition fleet and equipment toward low- or zero-emission alternatives (e.g. electric or hybrid vehicles, electric plant and equipment) - Apply equivalent or higher environmental standards across their own supply chain, and provide products which carry third party, independently verified ecolabels as part of the Global Ecolabelling Network (GEN) or as otherwise acceptable Ecolabelling standards. Examples include; • Good Environmental Choice Australia (GECA) • Water Efficiency Labelling and Standards (WELS) ratings • Carbon neutral certifications, such as Climate Active program or equivalent • Products that meet the Green Star Performance criteria • Products supported by a Whole-of-Life Costing (WLC), Life-Cycle Cost (LCC), Environmental Product Declaration (EPD), Life-Cycle Assessment (LCA) or Life-Cycle Inventory (LCI) - Where supplying higher-risk commodities, source from certified responsible or sustainable supply chains, and be able to demonstrate the origin and chain of custody on request. Recognised certifications by commodity include: • Timber or Paper; ◦ Forest Stewardship Council (FSC) or PEFC (Australian Forestry Certification Standard) • Textiles and Uniforms; ◦ Global Organic Textile, Standard (GOTS) ◦ OEKO-TEX ◦ Better Cotton, or equivalent • Electronics and IT hardware; ◦ EPEAT or Responsible Business Alliance (RBA) • Stone, concrete and aggregates; ◦ Responsibly sourced / chain-of-custody certification where available; declared free of engineered stone and compliant with crystalline silica controls. • Food and Catering; ◦ RSPCA Approved, Marine Stewardship Council (MSC), Rainforest Alliance, Fairtrade, or Certified Organic • Palm Oil and derivatives; ◦ Roundtable on Sustainable Palm Oil (RSPO)
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appropriately trained and motivated to conduct their activities in an environmentally responsible manner. - Where requested by Dexus, and to the extent reasonably practicable, provide verifiable data on energy consumption and greenhouse gas (GHG) emissions (Scope 1 and 2, and relevant Scope 3) associated with the goods or services provided to Dexus, to support Dexus's own emissions accounting and climate-related disclosures. - Where the supplier is subject to mandatory reporting obligations (for example, the Australian Sustainability Reporting Standards (ASRS) under the Corporations Act 2001 (Cth), maintain effective disclosure on environmental performance, risks, opportunities and commitments in accordance with those requirements.	- Where their activities may have material impacts (including land use, water, biodiversity, or ecosystem services), assess and manage those impacts consistent with emerging nature-related disclosure frameworks (e.g. TNFD), and provide reasonable information to support Dexus's own nature-related disclosures. - Participate in third-party sustainability ratings or disclosure platforms (e.g. EcoVadis, Sedex, CDP), and provide that data or certifications, as reasonably requested by Dexus from time to time. - Support industry innovation and sustainable design, for example by: • Disclosing embodied carbon data for materials and products supplied, • Offering lower-embodied-carbon or recycled-content alternatives, • Providing clean energy or energy efficiency solutions, or • Contributing to environmental stewardship initiatives or sustainable technology.
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Risk and Security Management

Maintain Insurances

Dexus is committed to working with suppliers that can demonstrate that they have appropriate insurances in place for the products and services they provide. Suppliers must hold and maintain adequate insurance cover, proportionate to the risk profile of the services provided, for the full duration of their engagement with Dexus. Required levels are determined by the risk classification of the service.

Minimum Supplier Requirements	Preferred Supplier Standards
- Maintain Workers' Compensation insurance (or equivalent statutory cover) in accordance with applicable state, territory, or NZ legislation for all personnel engaged in delivering the services. - Maintain Public & Product Liability insurance of no less than AUD \$20M / NZD \$5M at all times, regardless of service type or risk classification. - Where the engagement involves design, advisory, analysis, modelling, or certification, maintain Professional Indemnity insurance, in accordance with the terms under which the supplier is engaged for a minimum of 6 years after completion. - Provide evidence and currency of insurances prior to commencement, and renew without lapse for the duration of the term of engagement, including any extensions of term. - If the Supplier becomes aware of an event which may give rise to an insurance claim against it, or which might affect rights under the Suppliers policies of insurance,	- Suppliers may be requested to provide higher levels of insurance where they are engaged to deliver; • Higher risk construction and development projects, • Services to multiple Dexus managed assets concurrently, • Services involving direct access to personal data, payment data, or direct system access. - Provide claims history and Workers' Compensation premium rating as an indicator of safety performance, where requested. - Where the supplier accesses, processes, stores, or hosts Dexus, tenant, or customer data, or has network connectivity to Dexus systems, maintain Cyber Liability / Privacy Breach insurance, in accordance with the terms under which the supplier is engaged.



notify Dexus without unreasonable delay, and provide information to Dexus, which we may reasonably require.

Cyber and Information Security

Dexus is committed to preventing the loss, destruction, misuse, compromise, loss of integrity, or violation of confidentiality of any Dexus technology or information asset which could severely impact Dexus, its investors, and clients.

Minimum Supplier Requirements

- Suppliers must not (and must ensure that its Personnel do not) use or give any Confidential Information to any person except to its Personnel in the course of carrying out the Services or as required by law.

- Abide by all legislation and regulations in any applicable jurisdictions with respect to Information and Cyber Security.

- Use appropriate due diligence to secure any Dexus technology or information assets used, maintained, processed, accessed, or communicated, during the performance of services, and that information is safeguarded so that;

- Confidential information (including Personally Identifiable Information and sensitive business data) is appropriately maintained, and managed;
- Information is not stored, transferred or accessed from unsecured portable media devices, or cloud storage services not approved by Dexus;
- Integrity of information can be relied upon;
- Information is available when needed;
- Dexus can meet its legal, contractual and regulatory obligations;

- Suppliers are not to input any confidential, or personal information, held on behalf of Dexus, into AI models, unless Dexus has provided express consent to do so, under the terms of engagement with that supplier.

- Where reasonably requested by Dexus, disclose to Dexus any use of Artificial Intelligence (AI) used in the delivery of products or services to Dexus.

- Ensure any supplier (or subcontractor) personnel with access to Dexus data or systems, have received appropriate privacy and information security training commensurate with their role, and follow Dexus' procedures for accessing Dexus' technology or information assets, including remote access.

- Any loss, suspected compromised or unusual behaviour (including the type, date and time) is to be reported to Dexus without unreasonable delay.

- Where reasonably requested, complete Dexus' cyber security risk assessment, audits, or investigations.

Preferred Supplier Standards

- Maintain appropriate technical and organisational controls to protect Dexus information assets, including a documented Information Security Management System, Policy, or equivalent controls framework, proportionate to the sensitivity and volume of data processed;

- Hold, maintain, and report on performance against the following;

- Penetration testing
- Compliance with ISO 27001 (Information Security);
- Independent Certification of PCI DSS, SOC 1 Report
- SOC 2 Type 2 Reporting, Verification and Certification
- Cyber Security Management Practices aligned with NIST Cyber Security Framework (CSF 2.0)
- ASD Essential Eight (Maturity Level 2+)

- Demonstrate maturity with respect to the use of AI, with human-in-the-loop reviews at critical control points.



Data Privacy

Dexus is committed to protecting and maintaining the privacy of individuals and organisations who interact with Dexus. We comply with the privacy laws in Australia and New Zealand.

Minimum Supplier Requirements	Preferred Supplier Standards
- Abide by all legislation and regulations in any applicable jurisdictions with respect to Data Privacy. - Maintain their own Privacy Policy, in accordance with Privacy Act 1988 (Cth), and / or Privacy Act 2020 (NZ). - Suppliers must not transfer Personal Information outside Australia or New Zealand without prior written consent from Dexus, and an equivalent level of protection applies in the destination jurisdiction, or an exception under APP 8 or IPP 12 applies. - Upon termination or expiry of any agreement, or upon Dexus request, Suppliers must securely return or destroy all Personal Information and confidential data held on behalf of Dexus, and certify in writing that destruction has been completed. - Use appropriate due diligence to secure any Personal Information used, maintained, or accessed during the performance of services, and to ensure that information is safeguarded so that; • Personally Identifiable Information is to be managed in accordance with Privacy Act 1988 (Cth), and / or Privacy Act 2020 (NZ). • Dexus can meet its legal, contractual and regulatory obligations; • Any suspected or confirmed data breach, is reported to Dexus without unreasonable delay, • Where requested, complete Dexus's privacy impact assessment, third party assessment questionnaires, audits, or investigations.	- Where appropriate, Dexus encourages suppliers to hold or work towards certification against recognised information security standards, including; • ISO 27701 (Privacy Information Management); • APRA CPS 234 <u>Information Security</u> (if supplier services financial sector tenants or handles regulated data). - Collaborate with Dexus to identify privacy risks where sensitive personal information is collected, stored or processed.

Governance, Ethics and Transparency

Dexus is committed to and expects suppliers to conduct business with honesty, probity, equity, integrity and transparency. Suppliers must not engage in any conduct that could expose Dexus to bribery, corruption, fraud, or undisclosed conflicts of interest, whether directly or through their own sub-contractors and supply chain.

Minimum Supplier Requirements	Preferred Supplier Standards
- Comply with all applicable anti-bribery and corruption laws, including the <i>Criminal Code Act 1995</i> (Cth) (including the failure-to-prevent foreign bribery offence), and equivalent NZ legislation. Not offer, give, solicit or accept any bribe, secret commission, kickback or improper payment in connection with dealings with Dexus.	- Maintain a documented Anti-Bribery and Corruption Policy and Code of Ethics, reviewed at least annually, with Board or senior executive-level oversight - Maintain a documented Conflicts of Interest policy applicable to the supplier's own personnel, requiring proactive disclosure and independent



- Disclose to Dexus, prior to engagement and on an ongoing basis, any actual, potential or perceived conflict of interest — including personal, financial, or business relationships between the supplier's personnel or owners and any Dexus employee, officer, or director - Suppliers are not to provide gifts, entertainment, hospitality or sponsorship to Dexus personnel intended to (or that could reasonably be perceived to) improperly influence a business, procurement, or contractual decision, especially during a tender or selection process. Cash or cash-equivalent gifts (e.g. gift cards) must never be offered. - Supplier is sufficiently financially viable for the products or services, at the scale provided to Dexus, and can complete all obligations and contractual commitments. - Maintain accurate, complete and verifiable financial records, invoices and supporting documentation for all work performed for Dexus, and not engage in fraudulent invoicing, mischaracterisation of costs, or off-book arrangements. - Report, without unreasonable delay, any actual or suspected bribery, corruption, fraud, conflict of interest or other unethical conduct relating to the Dexus engagement. - Comply with all applicable sanctions and anti-money laundering / counter-terrorism financing laws, and not engage in dealings with sanctioned individuals, entities or jurisdictions in connection with the Dexus engagement. - The Supplier must not advertise or publish in its own marketing material, website, or social media, that the supplier carries out services for Dexus, without express prior written consent.	- review of conflicts before they affect dealings with clients such as Dexus. - Apply an equivalent gifts, entertainment and hospitality threshold and approval process across the supplier's own organisation, with records retained for audit. - Conduct the supplier's own due diligence and periodic monitoring of sub-contractors' ethical and governance conduct, and be able to demonstrate this to Dexus on request. - Participate in Dexus' Supplier Management Framework, and provide reasonable responses to Dexus, when information or reporting is requested, which may assist Dexus in assessing the performance of our suppliers and our supply chain, against this Supplier Code of Conduct.
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Performance and Value

Dexus not only expects suppliers to consistently deliver products and services of good quality and value, fit for the purpose intended, and fully compliant with all applicable legal and regulatory requirements, but to also commit to excellence throughout our respective supply chains, continuous improvement, and innovating to 'Find a Better Way'.

Minimum Supplier Requirements	Preferred Supplier Standards
- Comply in full with the form of contract under which the supplier is engaged by Dexus (including any agreement, purchase order terms, requirements brief, technical specification, scope, or schedule incorporated by reference), and not unilaterally vary, depart from, or substitute its own standard terms, in place of the agreed terms. - Provide products and services that are fit for purpose, meet the specifications, standards and service levels agreed in the contract, and comply with all applicable Australian and/or New Zealand legal, regulatory, and industry-standard requirements	- Participate in Dexus' Supplier Management Framework where the engagement is identified as in scope, including SLA / KPI measurement, and contract performance management meetings. - Maintain a documented Business Continuity Plan (BCP), sufficient to ensure continuity of outsourced services to Dexus in the event of a material disruption, Notify Dexus promptly upon becoming aware that a disruption event has occurred or is reasonably likely to occur.



(including relevant Australian/NZ Standards and codes of practice).

- Maintain quality assurance and quality control processes appropriate to the nature and scale of the products or services provided, sufficient to consistently meet the specifications, standards and service levels agreed with Dexus, and identify, record and correct defects or non-conformances.

- Promptly identify, disclose and remediate instances of non-conformance, defect, or service failure, including root-cause analysis and corrective action plans, where requested by Dexus.

- Demonstrate value for money through competitive, and transparent pricing, and disclose the basis of any pricing variation, applied over the term of the engagement.

- Where requested, articulate and substantiate the value delivered to Dexus beyond price — including quality, reliability, risk reduction, sustainability outcomes, and contribution to Dexus's broader business objectives.

- Where confidentiality obligations allow, proactively share innovations, or efficiencies identified on other clients' or sites' contracts that could benefit Dexus, our investors, or clients.

- Disclose where a proposed innovation involves a material change to scope, broader application, risk profile, or commercial terms, so it can be properly assessed, and approved before implementation.

- Operate a documented continuous improvement and quality management system (e.g. ISO 9001 or equivalent) covering non-conformance management and corrective action. Set and track annual continuous improvement program with progress reported as part of contract governance reporting.

- Treat continuous improvement as a standing obligation of the contract, not a one-off pitch made at tender stage. Review and refresh improvement initiatives at each opportunity of the contract lifecycle.

- Proactively report cost savings, efficiency gains, and added value delivered to Dexus over the contract term.

- Co-invest in trialling new technology, materials, or methods with Dexus on a pilot basis, sharing the risk and the upside of innovation outcomes

- Identify key risks and opportunities particularly in high value, high impact contracts and improve the overall impacts of the products and services we procure.

5. Implementation

We are committed to being a fair and collaborative partner, clear in our expectations, consistent in our approach, and supportive of suppliers in meeting these commitments. We recognise that achieving these standards across our supply chain requires ongoing effort, and we value openness, integrity and a shared commitment to continuous improvement. Dexus recognises that suppliers vary significantly in size, capability and risk exposure. Where appropriate, (ie where a supplier is a charitable, a not-for-profit organisation, or is microbusiness), Dexus may at its sole discretion apply exemptions to these requirements in a proportionate manner.

How we will implement this Code

Dexus will use the standards contained within this Supplier Code of Conduct to;

- Embed these requirements into our sourcing, and contracting processes, in accordance with the Dexus Procurement Policy, and Dexus' Procurement Excellence Method (PEM)
- Maintain a preferred panel of suppliers, pre-screened against the minimum requirements, and preferred standards, contained within this code.
- Train our employees and agents in these principles, so they can identify opportunities throughout the procurement process to minimise risk, improve supplier performance and create value.
- Assess each engagement against our sustainability principles, ensuring environmental and social impacts are considered in line with our policies, emerging best practice and industry standards.
- Apply a risk-based supplier monitoring program, involving supplier engagement, regular reporting and third-party validation as appropriate. Reporting requirements will be agreed during the procurement process.



Subcontracting and Supply Chain Requirements

Suppliers' use of Tier-n suppliers in the delivery of services presents an inherent risk to meeting these standards where not properly engaged, trained and managed. Any supplier directly engaged by Dexus is known as a "Tier-1" supplier. Where a Dexus supplier then sub-contracts work out we refer to that entity as a "Tier-n" supplier or third party.

Dexus does not accept any sub-contracting of services where we have not provided our express written consent to do so. Suppliers are required to obtain Dexus's prior written approval before engaging any sub-contractor. Sub-contracting without our express written consent is a material breach of this Code, and Dexus may exercise any rights we hold to deal with such breaches. Moreover, if Dexus grants approval for a Supplier to subcontract services, the arrangement will not relieve the supplier from any liability or obligation as per Dexus terms and conditions of business. Any supplier that elects to sub-contract work via the engagement of a Tier-n sub-contractor or supplier remains liable for the actions and omissions of that entity's employees, as if they were the actions or omissions of the supplier itself.

Where Suppliers, engage a Tier-n supplier or third party, to provide products or services to Dexus, under the terms of their engagement with Dexus, (in whole or part), the supplier must ;

- take reasonable steps, to ensure, its agreements with those Tier-n suppliers or third parties, contain substantially the same provisions as contained in the minimum requirements of this Supplier Code of Conduct, and
- have policies and procedures in place to monitor compliance with these requirements, within their own supply chain.

Annual Attestation

Suppliers are to provide an annual attestation stating that they comply with our Supplier Code of Conduct, and that the minimum requirements are flowed down to their supply chain. Suppliers unable to flow down these requirements to their supply chain, or deviating from these requirements, are required to advise Dexus during the annual attestation process.

Non-Compliance

We will maintain a register of Suppliers who are unable to comply with, or deviate from, this Supplier Code of Conduct. Where deemed appropriate we will consult with Suppliers, investigate, or escalate, in accordance with Dexus' Supplier Management Framework. Dexus reserves all rights under the terms and conditions of the engagement with each supplier, and where appropriate, may request further information, initiate remediation action plans, trigger other mechanism's available under the terms which the Supplier is engaged, or suspend suppliers from future engagements with Dexus.

Grievance Procedure

If you have any concerns about compliance with this Supplier Code of Conduct, or ethics issues while working for or with Dexus, or want to report illegal or unethical practice or behaviour, please contact:

Role: Head of Governance

Phone: +61 2 9017 1122

Email: governance@dexus.com

Alternatively, you can make a report through our independent disclosure management service provider, Your-Call. You can complete an online form on the Your-Call website at yourcall.com.au/report or call 1300 790 228 between 9:00am and midnight AEST (excluding weekends and public holidays) using Dexus's ID: DEXU5000. Your-Call is available to suppliers and their employees, and all disclosures are protected under Dexus' Whistleblower Policy.

6. Management and Review

This Supplier Code of Conduct will be reviewed every 2 years, or as required.

Version	Document Owner	Author	Approving Authority	Approved Date
5	Sustainability	Rob Sims	Senior Management – GMC level	27 Jul 2020
6	Sustainability	Josie Taslim	CEC	09 Nov 2022
7	Procurement	Andrew Dundas	Senior Management – GMC level	22 April 2024
8	Procurement	Rob Mackay	Policy Governance Committee	22 July 2026