



Real Estate Supplier Code of Conduct

November 2025

Being Accountable

The purpose of IFM Investors is to invest, protect and grow the long-term retirement savings of working people.

IFM Investors seeks to act ethically and responsibly, believing that safe, socially and environmentally sustainable companies create long term investment value. For our real estate portfolio, responsible supply chain practices are at the forefront of our investment and purchasing decisions.

We view suppliers as business partners and care about the way our suppliers do business. We are aware that the practices and behaviours of our suppliers can have an impact on our objectives and reputation.

Therefore, it is important that our suppliers share our beliefs around responsible supply chain management and demonstrate their commitment to sustainability integration.

This Real Estate Supplier Code of Conduct (Code of Conduct) outlines expectations of suppliers to our Real Estate investment portfolio in their management of sustainability-related risks.

Scope

This Code of Conduct applies to every organisation and individual that supplies goods or services procured by IFM Real Estate Fiduciary Pty Ltd, IFM Real Estate Fiduciary No. 2 Pty Ltd and IFM Real Estate Fiduciary No. 3 Pty Ltd (together “IFM”, “we”, “us” or “our”) for our Real Estate investment portfolio.

The suppliers are responsible for ensuring that their directors, officers, employees, and contractors comply with the requirements set out in this Code of Conduct, to the extent applicable and reasonable.

IFM also expects that its suppliers will set clear expectations of its own suppliers around responsible business conduct in line with the principles covered in this Code of Conduct.

Complying With the Law and International Standards

IFM expects its suppliers to act in a way which is consistent with their legal obligations, and to comply with all applicable laws in the countries in which their business operates. IFM also expects suppliers to comply with international standards around responsible business conduct everywhere their business operates, to the extent possible.

Supplier Code of Conduct Principles

IFM expects suppliers to comply with the requirements, and set reasonable expectations of their own suppliers, under each of the following principles, in the course of the supplier providing goods or services to us.

Governance and Ethics

IFM expects the highest integrity in all aspects of our business operations and take seriously the prevention of fraud and corruption. Our corporate policies are regularly reviewed and seek to eliminate corruption in all its forms, including bribery and extortion.

IFM expects its suppliers to be ethical, honest, reliable and proactive in their dealings with us. IFM requires suppliers to:

- Not commit, or become involved in, bribery or corruption of any form, including facilitation payments.
- Commit to ensuring their activities and commitments, and those of their employees and contractors, do not conflict with their ethical responsibilities to IFM under this Code of Conduct, or cause reputational damage to IFM by virtue of our relationship with the supplier.
- Comply with all relevant legislation and international standards including relating to anti-corruption, sanctions and fraud.

Human Rights and Modern Slavery

IFM seeks to conduct business in a manner that respects the human rights and dignity of all people. We support international efforts to promote and protect human rights, including opposition to all forms of slavery and human trafficking.

IFM's human rights commitments as it relates to the real estate investment portfolio are to respect the human rights of our employees, contractors, customers, communities, suppliers and other relevant stakeholders, and to identify and appropriately respond to our human rights risks.

IFM respects all internationally recognised human rights as set in the International Bill of Human Rights (consisting of the United Nations Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights) and the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#), in line with the UN Guiding Principles on Business and Human Rights.

We apply the following principles in our approach:

1. Working Conditions

We recognise our responsibility to provide:

- Safe and healthy working environments
- Fair pay and labour standards
- Reasonable working hours

2. Freedom of Association

We recognise that every worker has the right to collective bargaining and to join or not join a trade union.

3. Freedom From Slavery and Child Labour

We do not tolerate forced labour or other forms of slavery, including modern slavery as defined in the [Australian Modern Slavery Act 2018 \(Cth\)](#).

4. Access

We aim to provide universal access across our properties and increase accessibility through regular refurbishment. We will respect the rights of persons with disabilities and other at risk or vulnerable groups in designing and monitoring access to our properties.

IFM expects its suppliers to comply with these commitments and principles, and encourages them to adopt policies and processes necessary to respect human rights in line with all applicable laws and international standards including the [UN Guiding Principles on Business and Human Rights](#).

We encourage the reporting of human rights concerns by our suppliers and their workers through the [Business Ethics Contact Line](#).

Health and Safety

In line with IFM's 'do no harm' investment and operating philosophy, IFM expects suppliers to uphold its key health and safety philosophies:

- Injuries can be prevented;
- Health and safety risk management is a business imperative; and
- All stakeholders need to work together in prioritising the management of health and safety risk.

Suppliers will commit to complying with all relevant local, national and international health and safety laws, regulations, codes and standards in the course of supplying goods or services to IFM.

IFM requires its suppliers to have a documented health and safety policy and a management system to proactively identify, eliminate or mitigate health and safety risks and transparently report and investigate incidents. It is expected an assurance process is in place to confirm adherence with the supplier's policy and management system.

Environment

Suppliers will commit to complying with all relevant local, national and international environmental regulatory requirements and standards in supplying goods or services to IFM.

Suppliers agree to proactively manage their business's environmental impacts with respect to, but not limited to, energy, water, waste, resource consumption, embodied carbon, nature protection and biodiversity.

Suppliers are to regularly assess the environmental impacts of their business operations and set objectives and targets to track and reduce their environmental impacts. Where possible, suppliers should have a documented environmental management system in place appropriate to the level of impact.

Community

IFM's community includes our people, and those who visit, work and shop within our real estate assets. We take great care to ensure our investment and development decisions have a positive impact on the surrounding communities. IFM seeks to engage suppliers with compatible community values in their operations.

We encourage our suppliers to actively and meaningfully engage with the communities in which they operate. Where possible, IFM encourages suppliers to optimise opportunities to implement initiatives that positively impact those communities.

Inclusive Workplace Culture

IFM knows an inclusive culture that embraces diverse qualities, backgrounds and perspectives leads to more innovative thinking, better decision-making and competitive business performance. This extends to our suppliers and their workforce.

We will not accept discrimination of any kind based on gender, marital or family status, sexual orientation, gender identity, age, physical abilities, ethnicity, social origins, religious beliefs, cultural background or any other recognised status.

We embrace diversity and inclusion and strive for a safe and collaborative environment for all employees and suppliers to reach their full potential.

IFM acknowledges and respects the rights of Aboriginal and Torres Strait Islander peoples. We believe that indigenous people should have their rights and cultural heritage respected, with reconciliation action a key focus for the Real Estate investment portfolio. We seek to reinforce and extend our partnerships with Aboriginal and Torres Strait Islander organisations, groups and communities to increase respect, understanding and meaningful collaboration.

We encourage our suppliers to have a Diversity and Inclusion Policy in place and to support reconciliation in Australia.

Data Privacy and Cyber Security

IFM is committed to protecting its information assets and the privacy of its stakeholders. In the course of providing goods or services to IFM, suppliers are expected to implement and maintain robust measures for data privacy and cyber security.

In particular, IFM requires suppliers to:

- Comply with all applicable data protection, privacy and information security laws and regulations, including Privacy Act 1988 in Australia.
- Responsibly and lawfully use, store, disclose and manage all personal information which they may have collected from IFM's tenants and their staff, visitors to our properties and agents, contractors and suppliers.
- Implement and maintain appropriate technical and organisational measures, including but not limited to establishing a clear policy, to protect IFM's confidential information and personal data from misuse or loss and from unauthorised access, modification or disclosure.
- Ensure that their systems and networks used to process, store or transmit IFM's data are secured having regard to industry best practices.
- Provide adequate training to their employees and contractors on data protection and cyber security awareness.
- Restrict access to IFM's data to only those personnel who require it to perform their contractual obligations.
- Immediately notify IFM if they reasonably suspect a data breach of any information held or managed by the supplier on behalf of IFM or IFM's staff, tenants or customers.
- Cooperate fully with IFM in any investigation or remediation efforts related to a suspected or actual data breach.

Breaches of the Supplier Code of Conduct

IFM may at any time review or audit a supplier's compliance with this Code of Conduct. We treat breaches seriously and may take appropriate action to address breaches that we have identified or have been brought to our attention.

The appropriate action will depend on the severity of the breach, and where possible, we will establish corrective action plans to support suppliers in developing their capabilities and improving their performance.

IFM may terminate its relationship with a supplier if the supplier knowingly violates this Code of Conduct and refuses to implement improvement plans. Suppliers should disclose breaches of this Code of Conduct to IFM, including significant allegations from third parties relating to the areas covered in this Code of Conduct.

If you suspect or know that another supplier of IFM is not acting in a way which is consistent with their legal obligations, or which does not conform to this Code of Conduct, we encourage you to report it through our [Business Ethics Contact Line](#).

We also encourage suppliers to provide and maintain their own grievance mechanism for workers and suppliers in their business to safely raise concerns and complaints without fear of retaliation.

References

- [IFM Business Ethics Contact Line](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [Modern Slavery Act 2018 \(Cth\)](#)
- [Privacy Act 1988 \(Cth\)](#)
- [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#)