

Responsible Sourcing Policy

VERSION 1.2 | LAST ISSUED MAY 2026

Three Property Group Pty Ltd (ABN 77 101 540 863) trades as Held Building Management. References to 'Held' throughout this document refer to the building management operations of Three Property Group Pty Ltd.

A. PURPOSE

This policy sets out Three Property Group's commitment to responsible sourcing across all procurement activities connected with building management. It ensures that contractors and service providers engaged to maintain and operate buildings managed by Held are selected and managed in a way that is ethical, legally compliant, and aligned with the expectations of building owners and institutional clients.

B. SCOPE

This policy applies to all directors, employees and building managers involved in procuring or approving services for buildings managed by Held. It covers services procured for buildings under management including:

- Maintenance services: trades, engineering consultants, fire safety, lifts, mechanical and electrical contractors.
- Cleaning services.
- Security and concierge services.
- Waste management services.
- Pest control, landscaping and other building services.

C. POLICY STATEMENT

Held will select and manage service providers based on capability, safety, ethical conduct, and value, not lowest price alone. In doing so we will:

- Require all contractors to hold current licences, registrations and insurances required for their trade or service.
- Avoid engaging contractors with known records of Fair Work breaches, WHS non-compliance, or modern slavery risk.
- Require cleaning service providers to use products that meet recognised environmental standards where available, including GECA-certified or equivalent low-toxicity cleaning products.
- Include responsible sourcing obligations in all contractor agreements.
- Maintain an approved contractor register and review it at least annually.
- Apply additional due diligence to higher-risk service categories, particularly cleaning, security and labour hire, where modern slavery risks are most prevalent.

D. SUPPLIER SELECTION

For any contracted service with a value above \$10,000, Held will:

- Seek proposals from at least three providers.
- Evaluate proposals against documented criteria covering capability, safety record, ethical practices, and price.
- Verify licences, insurance certificates, and if applicable DBP Act accreditation, and ABN prior to engagement.
- Require completion of Held contractor onboarding documentation, including acknowledgement of the Supplier Code of Conduct.

For cleaning and other labour-intensive services, Held will additionally assess supply chain transparency, worker conditions, and whether the contractor holds a modern slavery policy or statement.

E. CONTRACT REQUIREMENTS

All contractor agreements will include obligations to:

- Comply with all applicable laws.
- Use sustainable products and practices where specified, including low-VOC materials and responsible waste disposal.
- Report any modern slavery concerns, safety incidents or compliance failures to Held promptly.
- Permit reasonable audit or verification of compliance with this policy on request.

F. MONITORING AND REVIEW

Held will:

- Review contractor performance annually, including quality of service, safety record and any complaints received.
- Conduct checks on higher-risk contractors, particularly cleaning and security providers.
- Remove contractors from the approved register where performance or compliance standards are not met.
- Review this policy annually and update it to reflect any changes in legislation or operational practice.

G. GOVERNANCE AND RESPONSIBILITIES

- Directors are responsible for approving the contractor register and any exceptions to this policy.
- Building managers are responsible for day-to-day implementation, including contractor onboarding and performance monitoring.
- All staff must use only approved contractors and report any concerns about contractor conduct to a director.

DOCUMENT REVISION HISTORY

VERSION	DATE	DESCRIPTION OF CHANGE	APPROVED BY	NEXT REVIEW
1.0	September 2025	Initial Responsible Sourcing Policy issued	Tony Paskell	September 2026
1.2	May 2026	Rebranded for changes to visual identity	Tony Paskell	September 2026