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Responsible and Sustainable Procurement Policy

1. Purpose

givvable Pty Ltd ("givvable") is committed to responsible and sustainable procurement practices that create positive environmental, social and economic outcomes while minimizing adverse impacts and delivering value for money, innovation, and risk-managed growth.

This Policy establishes how givvable integrates **environmental, social, ethical, and governance (Responsible Sourcing & Sustainability) considerations** into procurement decisions across our operations and value chain.

givvable is a United Nations Global Compact (UNGC) participant and this Policy reflects the Ten Principles of the UNGC relating to human rights, labor standards, the environment and anti-corruption, and other internationally recognized standards and frameworks.

2. Scope

This Policy applies to:

- All procurement of goods and services, and sponsorships funded by givvable
- All employees and contractors involved in procurement or supplier selection
- All suppliers, service providers, and partners engaged by givvable

This Policy covers givvable's key spend categories:

- Technology hardware
- Technology software and subscriptions
- Merchandise (including promotional items and apparel)
- Flights and accommodation
- Sponsorships at events and conferences
- Other spend categories

3. Policy Framework and Alignment

This Policy is informed by the following recognised frameworks and guidance:

- **ISO 20400:2017 – Sustainable Procurement (Guidance)**
- **ISO 26000 – Social Responsibility**
- **Australian Government Sustainable Procurement Guide (DCCEEW, 2024)**
- **Commonwealth Procurement Rules (CPRs)**, including CPR 4.5 on environmental sustainability



- **Australian Government Environmentally Sustainable Procurement (ESP) Policy**
(where relevant by category and value)

While givvable is not a Commonwealth or State entity, these frameworks inform this Policy as **best practice** and jurisdictionally relevant benchmarks.

4. Guiding Principles

All procurement decisions at givvable are guided by the following principles:

1. Value for money over the lifecycle

Considering total cost and total impact, not just upfront price.

2. Environmental stewardship

Protection of the environment, biodiversity and the restoration of natural habitats and reducing greenhouse gas emissions, waste, pollution, and resource use across the lifecycle of goods and services.

3. Social responsibility and human rights

Respecting human rights, safe and healthy working conditions, and ethical labour practices across supply chains.

4. Ethical and transparent behaviour

Acting with integrity, fairness, and accountability in all supplier relationships [and promoting social responsibility in the value chain].

5. Diverse and local community engagement

Supporting suppliers that actively participate in, promote, and prefer partnerships with diverse, social, local, and small business suppliers. Encouraging procurement practices that strengthen local economies, foster inclusive supply chains, and contribute to positive community outcomes.

7. Supplier engagement and continuous improvement

Working collaboratively with suppliers to improve sustainability performance over time.

Commented [MP1]: Do you want to include any principles that may support supplier diversity, local/small suppliers etc? Eg Telstra - Telstra Group prefers suppliers who promote diversity in their supply chains

5. Governance and Responsibilities

Board and Executive

- Approve this Policy and oversee performance
- Ensure suitable resourcing and capability

Commented [MP2]: Should there also be responsibility for reviewing this policy?

Business Managers

- Own and review this Policy
- Embed sustainability into procurement processes and templates
- Report progress and performance



Functional Leads

- Apply sustainability criteria in planning, sourcing, and evaluation
- Engage markets early to encourage sustainable solutions
- Document decisions and evidence
- Monitor supplier performance against contract and sustainability requirements
- Manage corrective actions where required

All Employees and Contractors

- Comply with this Policy and related procedures
- Use suppliers approved by Functional Leads and report concerns

Commented [MP3]: Which level will approval of suppliers sit at? Is this bullet point 1 for functional leads?

Commented [FA3R2]: @Megan Pepper this applies to all employees and contractors

6. Procurement Process Requirements

6.1 Planning and Risk Assessment

- Identify sustainability risks, opportunities, and material impacts by category
- Prioritise high-impact areas and set proportionate objectives
- Apply lifecycle costing where relevant (purchase, use, and end-of-life)
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6.2 Specification and Market Engagement

- Use outcome-based specifications that enable innovative, lower-impact solutions
- Incorporate minimum sustainability requirements and rated criteria
- Reference recognised standards, credentials, including certifications, or evidence where appropriate

Commented [MP4]: From what I could see, many best practice policies use “certifications” but given givvable’s broader focus on credentials, should we expand here?

6.3 Supplier Selection and Evaluation

- Evaluate suppliers on quality, cost, risk, and sustainability performance
- Weight sustainability criteria according to category risk and materiality
- Prefer suppliers with credible Responsible Sourcing & Sustainability practices and transparent reporting, having regard to givvable’s best practice modules and related indicators

Commented [MP5]: How would this be assessed?

Commented [FASR2]: @Megan Pepper including reference to BPIs here

6.4 Contracting and Supplier Management

- Embed sustainability obligations, KPIs, and reporting requirements in contracts
- Monitor performance and engage suppliers on continuous improvement
- Apply remedies where commitments are not met



7. Category-Specific Requirements

7.1 Technology Hardware

givvable will, where feasible:

- Prefer products meeting **TCO Certified, EPEAT Bronze or higher** and **ENERGY STAR** standards
- Require product stewardship and take-back at end of life
- Prefer repairable, durable devices with reduced toxic content and sustainable packaging

Commented [MP6]: TCO certified would be considered one of the best tech certifications and covers social and environmental so would recommend adding this here <https://tco-certified.com/>

7.2 Technology Software and Subscriptions

givvable will, where feasible:

- Prefer vendors disclosing data-centre energy and **water** use and using renewable energy
- Consider efficiency, security, privacy, and accessibility by design
- Assess supplier Responsible Sourcing & Sustainability governance and roadmaps for implementation
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Commented [MP7]: Next to energy, water usage is a major issue for data centres due to cooling needs

7.3 Merchandise

givvable will:

- Avoid single-use novelty items and prioritise durable, useful products
- Prefer recycled or organic materials and credible credentials, including certifications
- Require ethical sourcing and transparent supply chains as evidenced by credible credentials, including certifications

7.4 Flights and Accommodation

givvable will:

- Encourage lower-emissions travel options and virtual alternatives
- Prefer airlines and accommodation providers with **sustainability programs** and transparent reporting
- Consider emissions performance alongside cost, safety and timeliness

Commented [MP8]: How would we assess credibility? Some airlines use sustainable aviation fuel for some flights, others offer offsetting although it can be difficult to know how credible the offsets are.

Commented [FA8R2]: @Megan Pepper does this work?

7.5 Sponsorships at Events and Conferences

givvable will:

- Prefer events with sustainability plans (including for waste, plastics, inclusion, accessibility)
- Avoid unnecessary single-use materials and encourage modular/reusable stands
- Seek post-event reporting on relevant sustainability outcomes

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8. Supplier Expectations

All suppliers are expected to comply with givvable's **Supplier Code of Conduct**, which covers:

- Human rights and labour standards
- Workplace health and safety
- Environmental management and circular economy practices
- Business ethics, anti-corruption, and data protection

Adherence to the Supplier Code of Conduct is a condition of doing business with givvable.

9. Monitoring, Targets and Reporting

givvable will:

- Set measurable, category-appropriate procurement sustainability targets
- Review performance and report internally at least annually
- Use data and supplier feedback to strengthen continuous improvement

10. Non-Compliance

Failure to comply with this Policy or related contractual obligations may result in:

- Supplier corrective action plans
- Procurement restrictions
- Contractual remedies or termination

Commented [MP9]: For the supplier or employees?

Commented [FA9R2]: @Megan Pepper this is the supplier

11. Review

This Policy and the Supplier Code of Conduct will be reviewed at least every two years, or sooner where regulatory, business, or risk changes require.

Last reviewed: February 2025