

Responsible Procurement Policy

Operational Excellence

Current Review Date: September 2025

Future Review Date: September 2027

Classification:



Scope

This policy applies to the following:

Relationship to Keyton	Employment contract	Time type	Payroll type
✓ Employees	✓ Permanent	✓ Full time	✓ Salaried
✓ Directors	✓ Fixed Term	✓ Part time	✓ Wages
✓ Suppliers	✓ Casual		

Keyton reserves the right to modify Policies, Procedures, Standards and Guidelines periodically in response to changing legal obligations, industry standards, or business needs. Such adjustments will be communicated transparently to all relevant stakeholders.



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Diversity Statement

Keyton recognises the benefits that diversity brings to our business and the importance of Respecting Everyone's Journey. Our policies are inclusive and apply to all employees, regardless of age, gender, ethnicity, physical or mental ability, religion, sexuality, nationality, education, family responsibilities, and military or veteran status.

Purpose

This Responsible Procurement Policy (Policy) sets out the minimum requirements and responsibilities of all staff and suppliers for the procurement of products and services for Keyton, regardless of funding source. The Policy applies to all areas of procurement: sourcing, contracting, purchasing, payment facilitation and supplier lifecycle management.

Adherence to the Policy and following a compliant procurement process, mitigates the risk of unethical conduct and the perception of unethical conduct.

The purpose of this Policy is to provide the necessary guidance to ensure all purchasing activities and procurement decisions are made thoughtfully, ethically, systematically and:

- Consider value, criticality, risk, and the nature of the supply market to support an effective and efficient procurement process
- Prioritise Keyton's environmental, social and governance (ESG) commitments in relation to Modern Slavery, Reconciliation Action Plan, supplier diversity and inclusion, sustainability, and social procurement
- Leverage market competition to achieve optimal outcomes for Keyton, including the engagement of Keyton's preferred suppliers
- Conduct business legally, fairly and with integrity
- Comply with Keyton's EHS policy, Keyton Minimum Requirements and the Supplier Code of Conduct

Policy

This Policy must be read in conjunction with the relevant procedures, standards, guidelines and templates. Refer to '*Related Documents*' section of this Policy.

This Policy applies to all Keyton staff, contractors, consultants and/or third parties who are approved to make a spend commitment on behalf of Keyton. This policy applies in all locations where the business operates.



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Principles

The key principles underpinning this Policy are to:

- Have a long-term value mindset that prioritises the appropriate use of funds based on the total cost of ownership of the goods/services procured, minimises retrofitting, supports robust supplier relationships and supports Keyton's strategic priorities
- Drive sustainable procurement practices, making decisions that support Keyton's sustainability strategy
- Proactively engage with and support diverse suppliers that create a positive social impact in our communities
- Always demonstrate ethical, transparent and fair conduct in line with procurement probity, including open declaration of actual or perceived conflicts of interest
- Prioritise safe practices that protect the physical and mental wellbeing of our employees, the supplier's people and Keyton's residents
- Ensure procurement decisions align with Keyton's strategic goals and deliver value across the organisation by driving a contractual position that enables an optimal outcome for the whole of Keyton

Consequences of breaching this policy

All Keyton staff, contractors and associated parties are encouraged to report unethical misconduct in procurement to their direct line manager, the National Procurement Manager and/or Keyton's whistleblowing service, [Stopline](#).

For Keyton staff, non-compliance with this Policy may result in disciplinary action including termination of employment.



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Definitions

Term	Definition
Responsible Procurement	Procurement practices that consider ethical, environmental, social, and governance (ESG) factors in addition to cost and quality.
Total Cost of Ownership (TCO)	The complete cost of acquiring, operating, maintaining, and disposing of a product or service over its entire lifecycle.
ESG (Environmental, Social, and Governance)	A framework used to evaluate an organisation's ethical impact and sustainability practices.
Modern Slavery	Situations where individuals are exploited and cannot refuse or leave due to threats, violence, coercion, or deception.
Reconciliation Action Plan (RAP)	A strategic document that supports an organization's commitment to reconciliation with Aboriginal and Torres Strait Islander peoples.
Supplier Diversity	The proactive inclusion of businesses that are either owned by or employ underrepresented groups
Social Procurement	Using procurement to generate social value beyond the products and services being purchased.
Procurement Probity	The integrity, fairness, and transparency of the procurement process.
Conflict of Interest	A situation where actual or perceived personal interests could improperly influence professional decisions or actions.
Spend Commitment	An authorised decision to allocate company funds for purchasing goods or services.
Supplier Lifecycle Management	The process of managing a supplier relationship from selection and onboarding through performance monitoring and offboarding.
EHS Policy	Environmental, Health, and Safety policy outlining standards for workplace safety and environmental responsibility. Detailed in the Keyton Minimum Requirements (KMRs)