

# CLARK Property Partners Pty Ltd

ABN 68 641 858 737

t/as CLARK Commercial | CLARK Prestige | and associated divisions

CPP-POL-11

# Sustainable Procurement Policy

Version 1.2 | June 2026 | Approved: Stephen Clark, Managing Director

## Defined Term

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names is referred to throughout this Policy as "**CPP**". All references to CPP in this document apply to the entire organisation including all trading divisions, business names, personnel, directors, contractors and agents acting on behalf of CPP.

**01** Policy Statement

## 1. Policy Statement

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names ("CPP") is committed to procuring goods and services across all divisions in a manner that delivers value for money, upholds ethical standards, minimises environmental impact and supports local communities. Sustainable procurement is integral to CPP's ESG commitments and to its obligations to clients whose assets CPP manages.

**02** Scope

## 2. Scope

This Policy applies to all procurement of goods and services by CPP across all divisions — including facilities management contractors, cleaning and maintenance services, marketing and design services, legal and professional services, IT and office supplies, and any goods or services procured on behalf of managed assets.

**03** Core Procurement Principles

## 3. Core Procurement Principles

All CPP procurement decisions are guided by the following principles:

- Value for Money — achieving the best outcome for clients and CPP having regard to price, quality, capability and sustainability — not simply lowest cost
- Integrity — procurement conducted free from conflicts of interest, undisclosed relationships and improper incentives
- Transparency — procurement decisions documented and available for client review where the procurement is on behalf of a managed asset
- Sustainability — environmental and social considerations incorporated into supplier selection
- Local First — preference given to Gold Coast and Southeast Queensland-based suppliers where quality and value are comparable

**04** Supplier Qualification

## 4. Supplier Qualification

Before engaging any contractor or supplier on behalf of a managed asset, CPP will confirm:

- Current public liability insurance at the minimum level required by the relevant client agreement
- Workers compensation insurance as required by law
- A current and valid ABN and GST registration
- Relevant trade licences, permits and qualifications for the services to be provided
- Compliance with WHS requirements — including a WHS policy, SWMS/JSA capability and site induction completion
- A modern slavery compliance declaration
- An acceptable environmental management approach for the relevant services

**05 Environmental Procurement Standards**

## 5. Environmental Procurement Standards

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CPP will incorporate the following environmental criteria into procurement decisions:

- Preference for suppliers who use energy-efficient equipment, low-emission vehicles and environmentally responsible materials
- Preference for locally sourced goods and services to minimise transport emissions
- Preference for products with recycled content, minimal packaging and responsible end-of-life disposal
- Requiring waste management plans from contractors engaged for significant works at managed assets
- Preferring digital-first service delivery to reduce paper and printing waste

**06 Social Procurement**

## 6. Social Procurement

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CPP will consider social value in its procurement decisions:

- Support for local, small and medium enterprises across the Gold Coast and Southeast Queensland
- Support for businesses owned by or employing people from diverse backgrounds, including First Nations businesses where available and appropriate
- Preference for suppliers with demonstrated employee wellbeing, training and development commitments
- Avoiding suppliers with known records of workplace misconduct, discrimination or safety breaches

**07 Contractor Performance Management**

## 7. Contractor Performance Management

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CPP will monitor the performance of engaged contractors against agreed standards:

- Regular performance reviews for ongoing service contractors — no less than annually
- Immediate remediation required for any contractor not meeting agreed standards
- Non-compliant contractors removed from CPP's approved supplier list until compliance is demonstrated
- Contractor performance feedback incorporated into future tender and selection processes

**08 Conflict of Interest in Procurement**

## 8. Conflict of Interest in Procurement

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CPP's procurement processes are designed to eliminate undisclosed conflicts of interest:

- All CPP personnel involved in procurement decisions must declare any actual or potential conflict of interest before participating in a selection process
- No CPP personnel may receive personal benefit — financial or otherwise — from any contractor or supplier engaged by CPP
- No undisclosed referral fees, rebates or commissions accepted from any contractor or supplier

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**Stephen Clark**

Managing Director

CLARK Property Partners Pty Ltd

June 2026

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**Version 1.2**

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Policy Owner: Managing Director, CPP