

Peter Rowland | Ethical & Sustainable Purchasing Policy

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ETHICAL & SUSTAINABLE PURCHASING POLICY

1. Purpose

Peter Rowland Group is committed to ethical, transparent and sustainable procurement practices that:

- Protect wildlife and natural ecosystems
- Support Victorian and Australian producers
- Promote Indigenous economic participation
- Prevent corruption and conflicts of interest
- Align with ESG and conservation-driven supply chains
- Deliver safe, high-quality food and beverage services

This policy governs all purchasing activities across retail, catering, functions and back-of-house operations.

2. Policy Objectives

PRG's purchasing framework ensures:

1. **Local-first procurement**
2. **Indigenous supplier inclusion**
3. **Zero tolerance for bribery or unethical conduct**
4. **Environmentally responsible sourcing**
5. **Full legislative compliance**
6. **Traceability and supplier accountability**
7. **Alignment with conservation values**

3. Local Supplier First Policy

PRG prioritises local procurement as a core economic and sustainability principle.

3.1 Procurement Hierarchy

1. **First Preference** – Victorian suppliers
2. **Second Preference** – Australian suppliers
3. **Third Preference** – Ethical international suppliers (where local alternatives unavailable)

3.2 Local Supplier Definition

A local supplier:

- Is based in Victoria or Australia
- Employs local workforce
- Demonstrates responsible environmental practices
- Provides traceability of origin

3.3 Local Sourcing Targets

PRG aims to:

- Source a minimum of 90% of fresh produce from Victorian producers (subject to seasonal availability)
- Prioritise local bakeries, roasters, dairy producers and beverage suppliers
- Partner with regional and small-scale suppliers to support local economies

4. Indigenous Procurement Policy

PRG recognises the Traditional Owners of the lands on which we operate and supports Indigenous economic empowerment.

4.1 Commitment. PRG will:

- Actively identify and engage Indigenous-owned businesses
- Register and monitor suppliers via Supply Nation or equivalent verified databases
- Include Indigenous suppliers in tender evaluations where commercially viable
- Encourage subcontractors to adopt similar commitments

4.2 Indigenous Procurement Targets

Where possible, PRG aims to:

- Allocate a percentage of addressable spend to Indigenous-owned businesses
- Source Indigenous products (e.g., native ingredients, artwork, gifts, promotional items)
- Partner with First Nations enterprises for cultural experiences and menu storytelling

4.3 Cultural Respect

All Indigenous procurement will:

- Respect cultural IP and heritage
- Avoid misrepresentation
- Ensure fair and transparent commercial arrangements

5. Anti-Bribery and Ethical Conduct Policy

PRG maintains a strict zero-tolerance approach to bribery, corruption and unethical procurement conduct.

5.1 Prohibited Conduct

No employee, contractor or representative of PRG may:

- Offer, solicit or accept bribes
- Provide gifts or hospitality intended to influence procurement decisions
- Engage in facilitation payments
- Enter into undisclosed conflicts of interest
- Favour suppliers due to personal relationships

5.2 Gifts & Hospitality Controls

- Gifts over a nominal value must be declared
- Procurement decisions must be based on objective evaluation criteria
- All supplier negotiations must be documented

5.3 Conflict of Interest

All employees involved in procurement must:

- Declare actual or perceived conflicts
- Remove themselves from procurement decisions where conflicts exist
- Sign annual compliance declarations

6. Sustainable & Ethical Sourcing Standards- PRG ensures all suppliers meet minimum ESG standards.

6.1 Environmental Requirements -Suppliers must:

- Reduce single-use plastics
- Minimise packaging waste
- Provide recyclable or compostable packaging
- Comply with waste hierarchy principles (avoid → reduce → reuse → recycle → dispose)
- Demonstrate responsible land and water practices

6.2 Animal Welfare. All meat, dairy and egg suppliers must:

- Comply with Australian animal welfare standards
- Avoid illegally sourced or unsustainably harvested seafood
- Provide traceability documentation where required

6.3 Timber & Paper Products. Where wood-based products are used, preference will be given to:

- FSC-certified materials
- Recycled content products
- Sustainably managed sources

7. Product Selection & Quality Standards. All food and beverage products must:

- Meet Australian Food Standards Code
- Comply with food safety and traceability requirements
- Align with agreed menu and quality specifications
- Reflect healthy and sustainable food principles
- Meet agreed allergen and dietary compliance standards

Supplier quality audits may include:

- Product sampling
- Certification review
- Site inspection (where applicable)

8. Supplier Evaluation & Due Diligence. Before engagement, suppliers must:

- Provide ABN and compliance documentation
- Confirm WHS compliance
- Confirm Fair Work compliance
- Demonstrate financial stability
- Provide sustainability credentials where applicable

High-risk categories (e.g., seafood, imported goods) require enhanced review.

9. Return of Goods & Recall Procedures

PRG maintains strict product recall and returns protocols.

9.1 Non-Conforming Goods

- Immediately quarantined
- Documented via incident reporting system
- Returned to supplier or disposed of in accordance with safety standards

9.2 Food Recall

In the event of a recall:

1. Immediate removal from sale
2. Internal incident reporting
3. Notification to relevant authority (if required)
4. Traceability review
5. Corrective action implementation

All staff are trained in recall procedures.

10. Training & Induction

All procurement and operational staff receive:

- Ethical procurement training
- Anti-bribery awareness training
- Sustainability procurement guidance
- Indigenous engagement awareness
- Food safety compliance training

Refresher training occurs annually.

11. Continuous Improvement & Monitoring

PRG operates a continuous improvement framework including:

- Annual supplier performance reviews
- ESG supplier audits
- Waste and carbon tracking
- Indigenous procurement reporting
- Incident reporting and corrective action tracking

KPIs include:

- Local spend percentage
- Indigenous spend percentage
- Packaging reduction targets
- Supplier compliance rates
- Ethical breach incidents (target: zero)

12. Governance & Accountability

This policy is overseen by:

- Chief Operating Officer
- Finance & Procurement Lead
- Sustainability & Compliance Manager

The policy is reviewed annually or upon legislative change.

13. Compliance

This policy aligns with:

- Victorian Government Social Procurement Framework
- Local Jobs First Act
- Fair Jobs Code
- Australian Consumer Law
- WHS legislation
- Food Safety Standards
- Anti-Bribery and Corruption legislation

Non-compliance may result in:

- Supplier termination
- Disciplinary action
- Legal reporting obligations

Policy Declaration

Peter Rowland Group commits to ethical, transparent and conservation-aligned procurement practices that protect wildlife, empower communities, and deliver world-class hospitality.