

# GOODMAN GROUP MODERN SLAVERY STATEMENT 2024

This is Goodman's Modern Slavery Statement (Statement) for the financial year 1 July 2023 – 30 June 2024 (FY2024) published in accordance with section 16 of the Commonwealth *Modern Slavery Act 2018* (the Act) and section 54 of the *Modern Slavery Act 2015* (UK).

This Statement sets out the measures Goodman has taken to identify, manage and mitigate the risk of modern slavery practices in our global operations and supply chain and to maintain a responsible and transparent supply chain. References to "Goodman", "Group", "us", "we", or "our" in this Statement are references to the Goodman Group unless specified otherwise.

This Statement was approved on 16 October 2024 by the Goodman Group Board (as defined in SECTION 04) in their capacity as the principal governing body on behalf of the reporting entity (as defined in SECTION 03). This Statement is signed in SECTION 01 by the Independent Chairman and Group Chief Executive Officer (Group CEO).

This Modern Slavery Statement forms part of Goodman's overall corporate governance reporting including our [Annual Report](#) (which includes our Sustainability Report) and [Corporate Governance Statement](#).



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50M

PEOPLE LIVING IN  
MODERN SLAVERY  
GLOBALLY

28M

MEN, WOMEN  
AND CHILDREN IN  
FORCED LABOUR

Source: International Labour Organisation,  
The United Nations & Walk Free Foundation

<sup>1</sup> Mandatory criteria in section 16 of the Act.

Goodman supports the protection of human rights, and equity and fairness in our operations and supply chain. We acknowledge that modern slavery is global and pervasive and that mitigating modern slavery is an ongoing responsibility for businesses, governments, and society.

Modern slavery is a serious form of exploitation. The term “modern slavery” refers to a range of serious human rights violations, including forced, bonded and trafficked labour and the worst forms of child labour. It arises in circumstances where coercion, threats, or deception deprive people of their freedom and right to work at their free will.

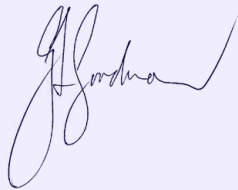
Modern slavery impacts all industries. We are conscious that some elements of our industry have an elevated risk of modern slavery and have designed our global modern slavery strategy in response to the level of risk. Our modern slavery strategy puts people at its centre and where we use the term “risk” in our Statement, we refer to the risk of harm to people.

Aligned with our values and commitment to safety and sustainability, we continue to respect and uphold the human rights of our people and workers in our supply chain. Our greatest risk of modern slavery practices is within our global supply chain which includes over 7,000 suppliers, and we work with our suppliers and other stakeholders to mitigate this risk. We are committed to further identifying modern slavery in FY2025, and addressing it through effective supplier engagement, partnerships and collaboration.

Our modern slavery strategy continues to mature year-on-year with targeted initiatives and actions to prevent modern slavery. Looking forward we see FY2025 as an opportunity to review our existing human rights due diligence approaches to identify any areas for improvement, and to evaluate key learnings from our existing processes and actions.



Stephen Johns  
Independent Chairman



Greg Goodman  
Group CEO

8 DECENT WORK AND ECONOMIC GROWTH



UN Sustainable  
Development Goal

Target 8.7

End modern slavery,  
trafficking and child  
labour

## OUR KEY HIGHLIGHTS FOR 2024



### **Enhancing supplier engagement and awareness through workshops and training**

Supplier engagement and awareness are important components of our modern slavery program for high risk suppliers to increase maturity in relation to understanding and managing the risk of modern slavery. We conducted deep dive workshops and training with strategic partners and high-spend general contractors in Australia, Hong Kong, China and the United Kingdom to deepen their understanding and improve practices.

### **Increasing worker awareness through initiatives such as training and promoting the availability of our grievance mechanism**

Worker awareness in our supply chain is an important part of our modern slavery program and this year we focused on training and continuing to raise awareness of the availability of our grievance mechanism through our website, training, awareness material and contractor sign-in processes.

### **Maturing our understanding of modern slavery risk beyond our first tier suppliers within segments of the second tier of our supply chain**

Recognising the complexities of extended supply chains, projects were continued or initiated to better understand modern slavery risks within segments of the second tier of our supply chain in Australia, Hong Kong, the United States and Brazil.

### **Increasing internal awareness through targeted modern slavery training**

Training of our people remains critical in mitigating modern slavery risk and we developed customised training to target teams who attend Goodman properties or directly engage with suppliers including procurement, property asset management and developments. These interactive sessions with current case studies enable our people to identify potential red flags and take appropriate action.

### **Reviewing our remediation process to consider how we would respond to any instances of modern slavery, provide remedy, and prevent future harm**

Reviewing our remediation pathway was a focus during this year and we refined our approach so that it can be responsive to impacted individuals and prevent future harm. As part of this review we assessed key considerations including understanding the facts, identifying responsible parties and our potential involvement in the harm, determining appropriate actions (including reporting, remedial actions and legal and/or expert advice and support), and implementing preventative measures to mitigate future risks.

This Statement has been prepared for the reporting entity, Goodman Limited, and the entities it owned and controlled (Goodman or Group) during the financial year ended 30 June 2024. Having regard to the Group’s stapling arrangements, this Statement also relates to the entities outlined in the table below and the entities they owned or controlled during FY2024.

Entity	Reporting status
Goodman Limited (GL) ABN 69 000 123 071	Mandatory reporting entity in Australia
Goodman Industrial Trust (GIT) ARSN 091 213 839	Voluntarily reporting in Australia
Goodman Logistics (HK) Limited (GLHK) BRN 59357133   ARBN 155 911 149	Voluntarily reporting in Australia
Goodman Logistics UK Holdings Limited (GLUKH) Company No. 05595801	Mandatory reporting entity in the UK





## Our structure

Goodman Group (Goodman or Group), is a triple stapled entity comprising the Australian company, Goodman Limited (GL), the Australian trust, Goodman Industrial Trust (GIT) and the Hong Kong company, Goodman Logistics (HK) Limited (GLHK). Goodman's stapled securities are listed and traded on the Australian Securities Exchange under the code GMG.

The total annual consolidated revenue of Goodman Limited at 30 June 2024 includes the results of GIT and GLHK. Refer to the [Goodman Group Annual Report 2024](#) for further information.

### Governance and process of consultation

The Goodman Boards and management team are committed to the highest standards of corporate governance and recognise that an effective corporate governance culture is critical to the long-term performance of the business.

The Boards of Goodman Group consist of the Board of GL, the Board of GFML as the responsible entity for GIT, and the Board of GLHK. The Boards of GL and GFML meet jointly and comprise the same Directors. GLHK has a separate board of Directors, the membership of which partially overlaps the GL/GFML Board.

The Boards oversee and regularly review the Group's corporate governance framework including our obligations as a responsible corporate entity, see [Goodman's Corporate Governance Statement 2024](#). Goodman's approach to assessing and addressing human rights and modern slavery risk is managed under the same governance structure for managing Goodman's sustainability risks and opportunities, as outlined below and also detailed in our Sustainability Report which is included in [Goodman's 2024 Annual Report](#).

The governance structure that follows and details of the process of engagement and consultation applies to all entities owned and controlled by the Group and covered by this Statement. The engagement and consultation with other entities as part of the development of this Statement was led by our modern slavery working group, which have global responsibility, with input from a number of key stakeholders across the Group. There was active engagement and consultation during the year with contributions from all operating regions, who were responsible for, and represented, the reporting entity and the entities it owns or controls. The Goodman Boards, Audit, Risk and Compliance Committee, Group CEO, Management Committee, Executive Steering Group and regional representatives all reviewed this Statement and provided feedback on its content.

## **GOVERNANCE STRUCTURE**

### **Goodman Group Boards**

Provide strategic direction and oversight of the management of Goodman. Delegate authority to the Audit, Risk and Compliance Committee to oversee management in implementing Goodman's modern slavery goals and actions. Hold the ultimate responsibility for approving Goodman's Modern Slavery Statement.

### **Board Committee: Audit, Risk and Compliance Committee**

Responsible for overseeing management in its implementation of Goodman's risk, compliance and safety frameworks. Have delegated authority from the Goodman Group Boards to oversee policies and programs in relation to social capital metrics including human rights, sustainable sourcing and modern slavery.

Operational issues including in relation to human rights or modern slavery are reported at each quarterly Audit, Risk and Compliance Committee meeting, with significant issues reported to the Boards.

### **Group Chief Executive Officer (Group CEO), Management Committee and Executive Steering Group**

The Group CEO is responsible for Goodman's overall operations and the implementation of its strategic plan. Accountable for managing human rights and modern slavery risks.

The Management Committee for the Group CEO oversees Goodman's core corporate functions including risk, compliance, safety, sustainability and procurement. Has oversight of any actions to assess and manage human rights and modern slavery risks.

The Executive Steering Group, comprising an Executive Director, Group Chief Financial Officer and Company Secretary & Group Head of Legal and Risk, oversees the modern slavery working group and provides input into Goodman's modern slavery strategy goals and actions.

Progress against Goodman's modern slavery goals, actions and regional initiatives is regularly reported to the Group CEO, Management Committee and Executive Steering Group.

### **Management: Modern slavery working group and regional representatives**

A cross-functional and multi-jurisdictional group including representatives from diverse teams including procurement, legal and compliance, risk and sustainability who are responsible for managing Goodman's modern slavery risks and actions including the development and implementation of policies, practices and reporting on modern slavery across our operations and supply chain including the compilation of this Statement. The working group meets regularly to drive continuous improvement in Goodman's approach to managing modern slavery risk.

The working group collaborates with regional representatives and facilitates regular workshops during the year to identify modern slavery risks and discuss actions being taken to address these risks. These workshops provided an opportunity to share best practice outcomes and expertise in relation to due diligence, supplier engagement, training, grievance and remediation.

## Our operations

Goodman is a global industrial property and digital infrastructure specialist. We provide essential infrastructure by delivering warehouses and data centres needed to power the digital economy. We do so by owning, developing and managing high-quality properties that are close to consumers in key cities around the world. These properties support the distribution and storage of goods, as well as data processing – critical components for the functioning of the economies we operate in and therefore essential infrastructure.

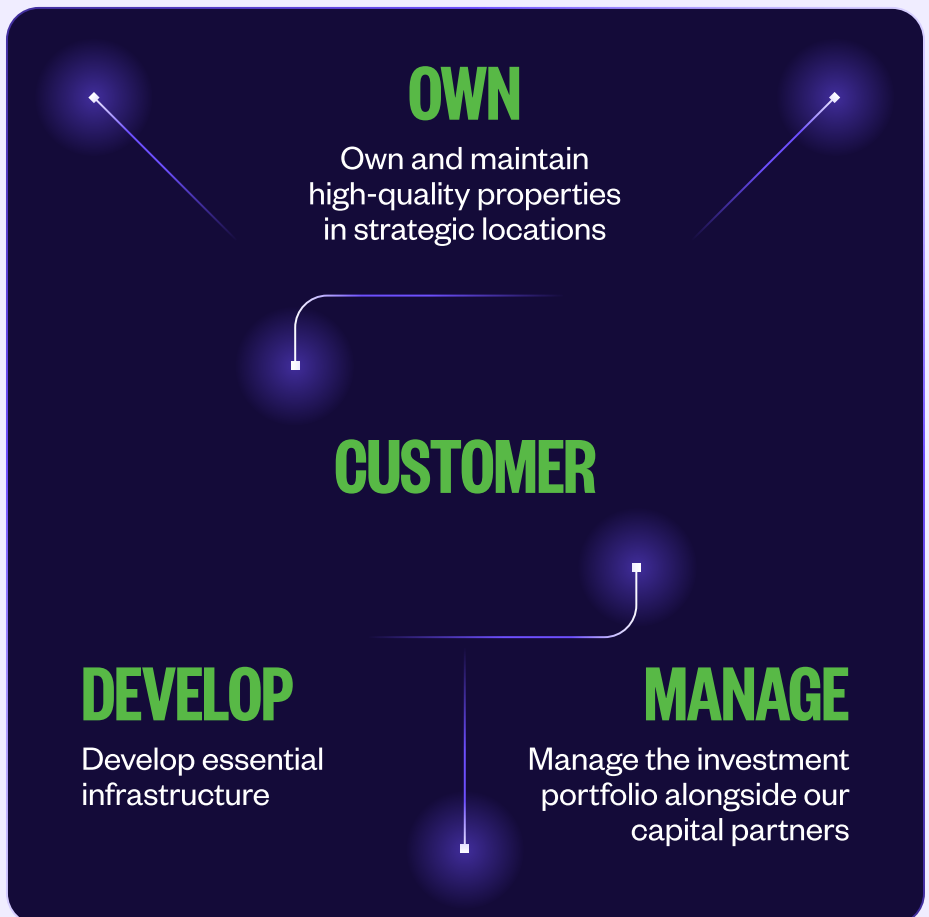
At 30 June 2024, we had 436 properties located in key consumer markets in 14 countries across the Asia Pacific, Continental Europe, the United Kingdom and the Americas (further details follow).

With a total portfolio value of \$78.7 billion at 30 June 2024, we are the largest property group on the ASX, an ASX top 20 entity by market capitalisation, and one of the largest listed specialist investment managers of industrial property globally. We invest significantly alongside our capital partners in our partnerships.

We have a team of just under 1,000 people, the majority of which are permanently employed, in 28 offices around the world. Our skilled people perform a diverse range of professional job functions including property services, property asset management, development and project management, investment management, human resources, information technology, risk management, legal, compliance, procurement, company secretarial and custodial services, marketing, stakeholder relations, sustainability, finance, tax, valuations and treasury functions.

We have approximately 1,700 customers across the e-commerce, logistics, retail, consumer goods, automotive, food production, pharmaceutical, life sciences, healthcare and technology industries.

Additional information about Goodman can be found on our website at [www.goodman.com](http://www.goodman.com).





## GLOBAL PRESENCE

## EUROPE / UK

**\$11.1BN**  
PORTFOLIO

**133**  
PROPERTIES

**230+**  
PEOPLE

**24%**  
OF TOTAL WORKFORCE

## ASIA

**\$23.2BN**  
PORTFOLIO

**80**  
PROPERTIES

**290+**  
PEOPLE

**30%**  
OF TOTAL WORKFORCE

## THE AMERICAS

**\$9.8BN**  
PORTFOLIO

**31**  
PROPERTIES

**110+**  
PEOPLE

**12%**  
OF TOTAL WORKFORCE

## AUSTRALIA / NZ

**\$34.6BN**  
PORTFOLIO

**192**  
PROPERTIES

**330+**  
PEOPLE

**34%**  
OF TOTAL WORKFORCE

● Current Goodman global presence.  
As at 30 June 2024 (Australian currency)

## OUR GLOBAL NETWORK

**\$78.7BN**  
TOTAL PORTFOLIO

**436**  
PROPERTIES

**14**  
COUNTRIES

JUST UNDER **1,000**  
PEOPLE IN **28** OFFICES

**43%**  
FEMALE

**57%**  
MALE

**1,700+**  
CUSTOMERS



Goodman Commerce Center Eastvale, Greater Los Angeles, USA

**Our supply chain**

Goodman has an extensive supply chain within each region in which we operate to help deliver our property development, property asset management and corporate activities. Our network of over 7,000 suppliers extends from our general building contractors who we work with closely to build facilities for our customers, suppliers who maintain our buildings, to the providers of our office supplies. Further information about our global chain supply is below.

We respect the needs of our suppliers and provide an environment for them to succeed by setting high quality standards and practicing good business ethics across our operations and global supply chain. This includes implementing strategies to protect human rights such as keeping our suppliers safe when on Goodman facilities and paying them fairly and on time. In return, we expect our suppliers to abide by our standards and cascade these standards to their own suppliers.



Our annual supplier spend is approximately AUD\$4.4 billion across the three key areas of our business as detailed below. This represents a marginal decrease from FY2023 due to the New Zealand business no longer being included following the internalisation of the NZX listed Goodman Property Trust (GMT).

**OUR GLOBAL SUPPLY CHAIN**

The table below summarises our supply chain in each of the key areas of our business:

Property asset management	Developments	Corporate
<b>Purpose</b>		
Suppliers to maintain and manage our 436 properties	Suppliers (general contractors and subcontractors) we engage for the development of new facilities and re-development of existing facilities with work in progress of \$13 billion	Suppliers and service providers responsible for supporting our corporate operations
<b>First tier suppliers – direct suppliers</b>		
Suppliers we directly engage to maintain of our properties including cleaning, security services, waste management, heating, ventilation and air conditioning services (HVAC), electrical work, fire safety, plumbing, landscaping, and general repairs	General contractors appointed for the construction of our facilities and responsible for development sites and supplying construction materials and labour directly or through subcontractors	Suppliers and service providers we directly engage to provide professional and financial services (e.g. accounting, legal and tax), IT equipment and support, office stationery and furniture, marketing merchandise, travel services and maintenance of corporate offices including cleaning, security etc.
<b>Second tier and beyond suppliers</b>		
Subcontractors and their contractors that provide materials, equipment, labour or specialised services to our first tier suppliers	Subcontractors and their contractors that supply materials, manufactured products, equipment, construction labour or labour used for the extraction, processing, manufacturing and transport of construction materials in relation to construction and material procurement	Subcontractors and their contractors that supply materials, goods, services or labour for services or the processing and manufacture of goods to support our first tier suppliers in relation to our corporate operations. Shipping and transportation are necessary to deliver these goods to us or our supply chain.

FIRST TIER SUPPLIER LOCATION AND SUPPLIER SPEND



THE AMERICAS

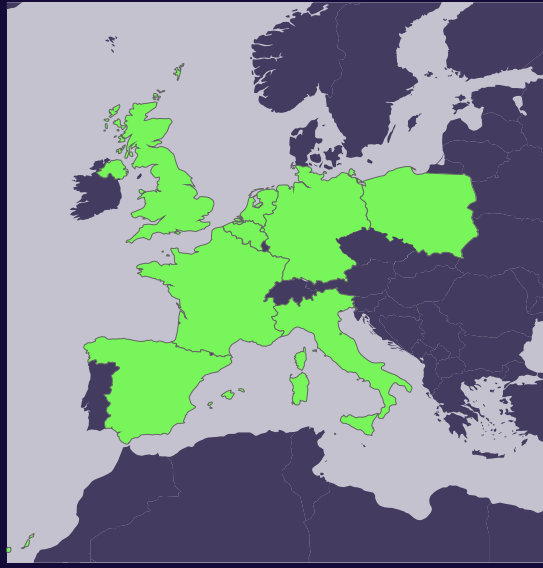
**\$579M**  
SUPPLIER SPEND

**1,201**  
SUPPLIERS

**\$80M**  
PROPERTY MANAGEMENT

**\$310M**  
DEVELOPMENTS

**\$189M**  
CORPORATE



EUROPE/UK

**\$424M**  
SUPPLIER SPEND

**2,353**  
SUPPLIERS

**\$75M**  
PROPERTY MANAGEMENT

**\$289M**  
DEVELOPMENTS

**\$60M**  
CORPORATE



ASIA

**\$1.75BN**  
SUPPLIER SPEND

**2,045**  
SUPPLIERS

**\$249M**  
PROPERTY MANAGEMENT

**\$1.21BN**  
DEVELOPMENTS

**\$294M**  
CORPORATE



AUSTRALIA

**\$1.71BN**  
SUPPLIER SPEND

**1,964**  
SUPPLIERS

**\$341M**  
PROPERTY MANAGEMENT

**\$1.0BN**  
DEVELOPMENTS

**\$365M**  
CORPORATE

**TOTAL**

**\$4.4BN**  
SUPPLIER SPEND

**7,563**  
SUPPLIERS

**\$745M**  
PROPERTY MANAGEMENT

**\$2.8BN**  
DEVELOPMENTS

**\$908M**  
CORPORATE

In this section we describe our understanding of modern slavery risks in our operations and supply chain. Our analysis is informed by:

- 1. Inherent industry risk:** the risk factors and potential modern slavery practices in property and construction.
- 2. Goodman specific risks:** risks specific to Goodman’s operations and supply chain which includes an analysis of geographic risk across the regions in which we operate.

We have defined “risk” as circumstances where people are experiencing or are at risk of exposure to modern slavery.

**Inherent risks in the property and construction industry**

The property and construction industry has a high prevalence of modern slavery and drivers of risk exist in all countries including:

- + High demand for workers vulnerable to exploitation e.g. use of low-skilled, low wage, contract and migrant workers
- + Business models relying on high levels of outsourcing including labour recruitment and the use of subcontractors
- + Reliance on long and complex supply chain for building materials including raw materials sourced from high risk geographies with a history of forced, bonded and child labour
- + Cost driven sectors relying on low margins and tight project timelines.

As a consequence of the above factors, the types of modern slavery found in the property and construction industry and related supply chains include:

<b>FORCED LABOUR</b>	<b>THE WORST FORMS OF CHILD LABOUR</b>
<b>HUMAN TRAFFICKING</b>	<b>DEBT BONDAGE</b>
<b>DECEPTIVE RECRUITMENT FOR LABOUR OR SERVICES</b>	<b>SLAVERY OR SLAVERY LIKE PRACTICES</b>

**Goodman’s assessment of our modern slavery risks**

**Risks in our operations (direct workforce)**

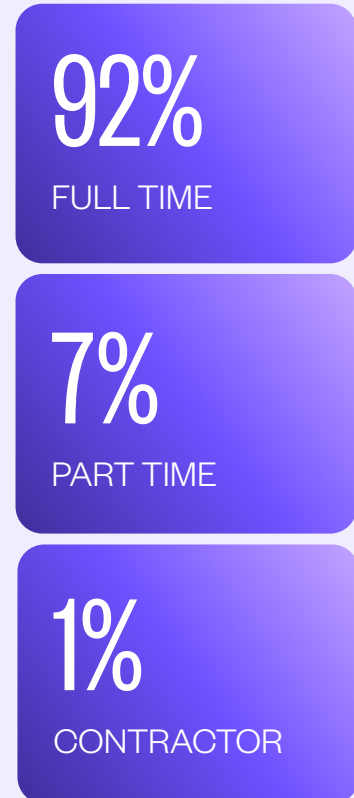
In FY2024, the modern slavery risks in our operations and direct workforce remained very low in relation to forced, bonded or child labour and other exploitative labour practices as there is direct visibility over the employment terms and conditions of our people.

Goodman’s workforce is located across the Asia Pacific, Continental Europe, the United Kingdom and the Americas. Our global workforce consists of skilled professionals providing predominantly office-based services. The majority of our people are permanent employees, with only 1% of our workforce being independent contractors working in professional roles. We recognise that in some contexts, contract (non-permanent) workers are more vulnerable to exploitation, however we continue to maintain internal processes and controls to comply with our legal and contractual obligations and to manage entitlements relating to contractors.

Permanent employees, both full-time and part-time, regardless of position are eligible to participate in short-term and long-term incentives. We also undertake a global annual gender equity review to confirm that remuneration outcomes are based on performance and not any form of indirect discrimination.

Goodman makes the health and wellbeing of our people a priority. We have a comprehensive set of policies that contribute to a safe and fair working environment including the ability to raise a concern about any unethical or illegal conduct, an unsafe work practice or a human rights issue.

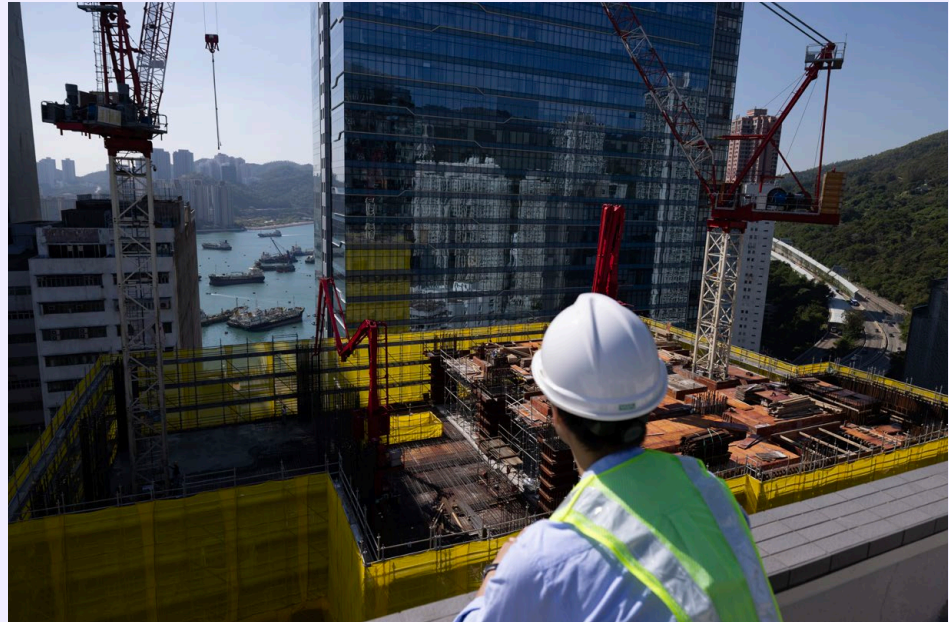
**GOODMAN WORKFORCE**



**Risks in our supply chain**

In FY2024, we re-examined the risks of modern slavery in our supply chain in relation to modern slavery information through internal risk assessments and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and the Walk Free Foundation: Global Slavery Index 2023.

Our supply chain has been assessed against inherent risk factors and other attributes that increase vulnerability in our global supply chain including vulnerable workers, high risk geographies, business models and products to identify workers more likely to face modern slavery risk. We also considered supplier spend across our supply chain. The table below summaries our findings.



Risk factors			
Supply chain and workers at risk	Reliance on vulnerable workers	High risk business models	High risk geographies and product risk
<p><b>Developments</b></p> <p>Third party construction labour and labour used for the extraction, processing, manufacturing and transport of construction materials e.g. bricks, cement, timber and manufactured products (solar, HVAC and electrical)</p> <p><b>Property asset management</b></p> <p>Third party labour for cleaning, landscaping and security services</p> <p><b>Corporate</b></p> <p>Third party labour for the processing and manufacture of corporate merchandise, office related products and IT/ telecommunications equipment</p>	<p>Suppliers using a higher proportion of low-skilled, casual or migrant workers less aware of their rights, without knowledge of the primary language in the relevant country or with visa insecurity making them more susceptible to exploitation through forced or bonded labour.</p>	<p>Suppliers with high risk business models relying on outsourcing, subcontracting and casual labour resulting in low visibility of labour practices and potential labour exploitation through forced, bonded or child labour.</p> <p>Suppliers operating in price competitive and low margin markets using low paid labour to meet project and services costs and tight construction project timelines.</p>	<p>Long and complex supply chains for materials and products from jurisdictions with lack of regulation, weaker labour laws and lower human rights standards resulting in potential risks of exploitative labour practices and dangerous and insecure working conditions.</p> <p>Products used in the construction industry linked to child or forced labour as listed in: ILAB's <a href="#">List of Goods Produced by Child Labor or Forced Labor</a></p>

**Goodman’s risk based response and continuum of involvement**

In developing our risk based response, we have considered the above risk factors and are guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) continuum of involvement to assess our relationship to modern slavery risk and whether we may have caused, contributed to, or are directly linked to any harm (refer to the further analysis that follows). Goodman prioritises our response to modern slavery risks by considering the greatest risk to people and then assessing our influence and leverage to increase supply chain transparency and remediability of any potential impacts.

Based on our risk analysis, we have continued to focus our attention on our first tier suppliers in high risk parts of our supply chain where we can use our influence and leverage to mitigate modern slavery risk such as third party construction labour and third party labour for cleaning, landscaping and security services. In FY2024, we engaged 682 first tier high risk suppliers globally (9% of total global suppliers) representing approximately \$1.8 billion in supplier spend in developments (principal contractors) and property asset management maintenance services (cleaning, landscaping and security services).

**HIGH RISK GLOBAL SUPPLIER SPEND**

**96%**

DEVELOPMENTS  
(\$1.7BN)

**4%**

PROPERTY ASSET  
MANAGEMENT  
(\$82M)

- Cleaning \$21M
- Landscaping \$30M
- Security \$31M



**ASSESSING OUR CONTINUUM OF INVOLVEMENT**

Goodman’s potential connection to modern slavery		
Caused	Contributed	Directly linked
We could cause harm where activities (or omissions) in our operations result in harm e.g. exploiting our direct workers.	We could contribute to harm when activities (or omissions) in our operations or supply chain significantly facilitate, enable or incentivise a third party to cause harm e.g. contracting with a supplier with unrealistic project costs and milestones which can only be met using exploited labour.	We could be directly linked to harm caused by a third party if the harm is linked to our operations and supply chain, including products and services, through the business relationship e.g. our supplier engages a subcontractor to source building products from suppliers who source these products from overseas jurisdictions with low human rights standards for extraction and processing that may include the use of forced labour.
Risk identification		
Caused	Contributed	Directly linked
Goodman has not identified that we have caused modern slavery in our direct operations.	Goodman is not aware of having contributed to modern slavery. We accept that this risk is possible due to high demand for low-skilled workers and the fact that many of our projects are driven by price and tight timelines. This is a key risk area that Goodman seeks to manage through its various programs.	Goodman is most at risk of being directly linked to human rights harms in our extended supply chains including our second tier suppliers and beyond who source construction materials and manufactured products from higher risk geographies associated with insecure working conditions, forced labour and child labour. There is risk in this extended supply chain which Goodman seeks to manage through its various programs but there are also limitations in terms of transparency of source of material, alternative supply and varying government responses including product bans.
Risk management		
Caused	Contributed	Directly linked
Goodman manages this risk by having visibility over the employment terms and conditions of our people and availability of a whistleblowing mechanism.	Goodman’s approach to managing this risk is multipronged including internal training for our people and training for suppliers to increase awareness and understanding of modern slavery risk as described in our actions in SECTION 06.	Goodman manages this risk in a variety of ways as described in SECTION 06. Our approach differs between regions but includes educating our people, suppliers and workers in relation to modern slavery, making our grievance mechanisms available to suppliers and their workers and the selection and engagement with our first tier suppliers, with whom we have the greatest leverage. Our interactions with our first tier suppliers are designed to develop their risk awareness and to encourage them to improve their understanding of their supply base so that they can best manage risk within their direct supply chain. This includes sourcing services, materials and products from suppliers who are committed to responsible business conduct and implementing measures to mitigate modern slavery risks.
Remediation approach		
Caused	Contributed	Directly linked
If Goodman causes a negative human rights impact we are committed to preventing the action causing the harm and providing remedy to impacted individuals.	If Goodman contributes to a negative human rights impact we are committed to preventing the action causing the harm, using influence to mitigate any remaining harm, and providing for or co-operating in the provision of remedy to impacted individuals.	If Goodman is directly linked to modern slavery we will seek to prevent or mitigate any adverse human rights impacts but acknowledge that our ability to use influence or remediate the situation may be more limited if the exploitation is deep within our supply chains and our leverage is limited.

## SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation

### Advancing modern slavery commitments through continued regional engagement and tailored actions to overcome challenges

Goodman has adopted global modern slavery standards to address modern slavery and labour protection risk in our operations and supply chain through program controls including policies, due diligence and training. Our FY2024 actions continued to focus on identifying risks to people and where we could use leverage to influence outcomes. We have continued to implement foundational actions such as contractual measures and more complex risk management actions such as supplier capacity building through training and awareness. The pillars of our framework are repetition and awareness of key messaging, direct and ongoing engagement with our people and suppliers and having grievance mechanisms that are both trusted and readily accessible.

We continued to embed our human rights and modern slavery commitments in the regions in which we operate. The modern slavery working group facilitated quarterly workshops with each region comprising cross functional regional representatives responsible for managing modern slavery risk. Due to differing levels of awareness, socio-economic disparities and varying legislative requirements across the regions we operate in and within our global supply chain it remains challenging to enforce actions uniformly to mitigate modern slavery. To overcome this, each region has adopted tailored actions to mitigate modern slavery risk to improve outcomes. The workshops were an opportunity to share best practice outcomes and expertise to assist the regions implement policies and targeted actions to manage modern slavery risk as described in this section. This section details our FY2024 goals and actions, what we achieved, and our effectiveness. We have also considered the effectiveness of our FY2024 actions in SECTION 07 and detailed our refined goals and actions for FY2025.





# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## POLICIES, CONTRACTS AND PROCUREMENT PROCESSES RESPONSIVE TO MODERN SLAVERY RISK

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
<p>Confirm that our key policies and contracts are responsive to the risks we have identified and are being implemented</p>	<p>Review our key policies and contracts with the aim of confirming they align with best practices and effectively address the modern slavery risks that we have identified.</p> <p>Assess whether our procurement processes globally (including tendering, contracting, supplier onboarding and pre-qualifications) are effectively identifying and taking into consideration modern slavery risk.</p>	<p>All key policies and precedent agreements or contracts reviewed and updated where appropriate.</p> <p>Undertake checks to evaluate compliance against key policies and procedures.</p>

Goodman’s approach to modern slavery mitigation and its practical effectiveness is aligned with a comprehensive set of global policies which reinforce our values and ethical expectations of our people and suppliers. This year we conducted a review of our key policies and contract precedents to confirm they were still aligned with and referenced human rights considerations and modern slavery risk. We also continued strengthening our modern slavery due diligence across all regions by integrating pre-qualification processes such as supplier assessments into our tendering activities and an internal audit was conducted in Australia with a focus on development contractor engagement and pre-qualification. We are committed to reviewing our existing human rights due diligence approaches to identify any areas for improvement in line with best practice and regulatory requirements in FY2025. A summary of our actions this year is as follows:

### Policy framework

The key changes in relation to our policies this year were the introduction of the Respect at Work Policy in August 2024 consolidating the Workplace Bullying and Harassment Policy and Sexual Harassment Policy, and update of the Sustainable Sourcing Framework (as detailed in the Case Study that follows). There were no significant changes proposed to the other policies or contract precedents and the review concluded that these documents adequately reference our commitment to human rights and modern slavery.



## SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

Our policy framework is actively communicated and supported, seeking to ensure that our people and suppliers understand our expectations around protecting human rights, preventing modern slavery and labour exploitation and can recognise when to raise a concern. The following policies are the most relevant to human rights and modern slavery and were operational during the reporting period:

Policy – Operations	Purpose
Goodman Code of Conduct	Provides the ethical and legal framework for our people in conducting Goodman’s business. The Code requires compliance with legal requirements, ethical expectations and fundamental human rights and details the whistleblowing mechanisms in place to report any ethical concerns including in relation to modern slavery and human rights.
Respect at Work Policy	Goodman articulates our expectations in relation to the behaviour of our people and our commitment to providing a safe, respectful and inclusive workplace free from bullying, discrimination, harassment, sexual harassment and other harmful conduct.
Inclusion and Diversity Policy	Goodman fosters a work culture of inclusivity and diversity and focuses on the wellbeing, health and safety of our people and our contractors.
Anti-Bribery and Corruption Policy	Outlines our commitment to complying with laws and regulations addressing fraud, bribery and corruption in each country in which we conduct business.
Ethical Concerns (Whistleblower) Policy	An anonymous reporting channel for anyone (including whistleblowers) to raise concerns about human rights or modern slavery concerns.
Modern Slavery Operational and Supplier Standards	Global standards and guidelines to address human rights, modern slavery, and labour protection by detailing key operational expectations.
Policy – Supply Chain	Purpose
Statement of Business Ethics	Communicates our expectations of suppliers regarding environmental, social, and governance risks and impacts, including complying with applicable legislation in relation to labour practices and respecting and supporting human rights. Made available through our website and contractual engagements.
Procurement Policy	This provides guidance and direction for Goodman’s tendering and procurement practices including our commitment to responsible supply chain management.
Sustainable Sourcing Framework	This sets our expectations for our people when engaging suppliers in relation to responsible sourcing and human rights and details our grievance procedures.
Ethical Concerns (Whistleblower) Policy	As above, this establishes the reporting mechanisms for suppliers for any grievances including in relation to human rights or modern slavery concerns. Concerns can be raised anonymously.
Global Safety Framework	Goodman is committed to the prevention of harm and this sets a minimum standard of safety that we require across our global operations in line with Goodman’s risk appetite.
Modern slavery Operational and Supplier Standards	Global standards and guidelines to address human rights, modern slavery, and labour protection by setting out our supplier expectations.

Goodman’s Corporate Governance Statement and policies are available [here](#).

## CASE STUDY

### Sustainable sourcing framework refresh

Our Sustainable Sourcing Framework (SSF) was first developed in 2022 to offer strategic guidance in accomplishing our global sourcing and supply chain objectives and address issues such as human rights, modern slavery, social procurement and sustainability. It was also created to support the sustainability priorities in our [2030 Sustainability Strategy](#) by influencing (where appropriate and possible) the practices of suppliers in our value chain.

In FY2024, we refreshed our [Sustainable Sourcing Framework](#) to address two key priorities: demonstrating Goodman's values by promoting diversity, inclusiveness, and social equity, and influencing the sustainability (environmental and social) practices of our value chain.

The SSF aims to safeguard human rights throughout our supply chain and minimise the risk of modern slavery and help support the goals of our modern slavery risk mitigation. By integrating modern slavery considerations within the SSF, we aim to normalise and embed best procurement practices that encompass all the critical attributes of both modern slavery prevention and sustainable sourcing.

Our SSF strategy for FY2025-2026 focuses on embedding this framework across all regions, emphasising the inclusion of diverse suppliers, especially those from underprivileged groups, and those committed to environmental and social sustainability. We aim to improve social and environmental outcomes by working with suppliers who engage, employ, and support underprivileged groups and who are committed to achieving sustainability initiatives.

Our SSF implementation approach involves collaborating closely with regional stakeholders to align on values and ensure compliance with local laws and regulations. We are committed to managing risks associated with

breaches of guidelines and regulatory obligations through due diligence in procurement and contractor management. The framework includes creating procurement toolkits that promote the implementation of the SSF to support social, ethical, and environmental performance. We aim to engage suppliers where possible,

to raise awareness and encourage sustainable sourcing practices.

Our Modern Slavery Operational and Supplier Standards are an important part of our SSF as they address human rights, modern slavery and labour protection across our operations and supply chain.



## SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

### Enhancing Modern Slavery due diligence approaches in procurement

To manage supplier relationships and mitigate risk we have continued to implement a variety of supplier pre-qualification and due diligence tools, each customised to suit the unique requirements of our regional supply chain maturity and respective legislative frameworks including industrial laws. Tools include supplier pre-qualification, onboarding and ongoing engagement questionnaires and declarations, contract clauses and our Statement of Business Ethics. By tailoring our approach to fit the needs of each region, we seek to ensure that due diligence adoption is successful and a consistent component of our supplier engagement strategy globally.

Goodman conducts numerous tendering and contracting opportunities, requiring suppliers to undergo a pre-qualification and onboarding process. To enhance control measures we continue to use supplier questionnaires or declarations to identify potential red flags. The approach by region is as follows:

<b>Australia</b>	Pre-qualification questionnaire for property asset management suppliers in Cm3 (contractor management system) and questionnaires sent to all development general contractors that Goodman has worked with in the last 12 months
<b>Hong Kong</b>	Questionnaire included in pre-qualifications for development and surveys for property asset management
<b>China</b>	Written undertaking/declaration and supplier induction process (inclusive of modern slavery)
<b>Japan</b>	Written undertaking/declaration
<b>Continental Europe</b>	Questionnaire in tenders and EcoVadis modern slavery scores in selection criteria for larger tenders
<b>United Kingdom</b>	Pre-qualification questionnaires and property asset management due diligence for first tier suppliers
<b>United States</b>	Vendor onboarding/ pre-qualification questionnaire including a pilot to capture origin of major material purchases in tenders within development
<b>Brazil</b>	Vendor onboarding survey including modern slavery questions



# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## ENHANCING OUR UNDERSTANDING OF SUPPLY CHAIN RISK THROUGH SUPPLIER RISK MAPPING AND ASSESSMENTS

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
<p>Enhance our understanding of our supply chain risk and develop action plans where needed</p>	<p>Continue risk mapping across our global supply chain.</p> <p>Continue yearly assessments, surveys and/ or declarations across all regions.</p> <p>Continue supplier response reviews in high risk categories across various regional assessment processes.</p>	<p>Review procurement data across suppliers in high risk sectors for better visibility and risk mapping.</p> <p>Finalise review of supplier due diligence questionnaires or declarations completed to date or during the year.</p> <p>Each region’s due diligence process (assessments, surveys, declarations, written undertakings) to be completed for suppliers in high risk sectors.</p> <p>Meet with at least 10 current suppliers from high risk sectors, to discuss their modern slavery strategy and remediation framework.</p> <p>Develop an action plan for high risk suppliers where appropriate.</p>

A number of actions have been undertaken this year to further understand supply chain risk including risk mapping, questionnaires or declarations, response analysis and supplier due diligence. It is expected that supply chain risk reviews, increasing supplier awareness and mitigating risk in supply chains will be an ongoing process. Looking ahead, it will be crucial to continue our efforts to engage with suppliers to increase awareness and improve practices, and for our suppliers to filter this through their own supply chains.

Regions have continued to independently review their supplier risk mapping appropriate to their risk profile including vulnerable workforce, business model and geographic location to identify where modern slavery risks are most prevalent in our supply chain. This risk mapping is part of a recurring supplier due diligence process which builds on review of supplier responses from surveys, declarations or review of modern slavery statements to understand risk, and to identify if any actions need to be implemented.

To further understand risk this year some regions conducted supplier deep dives (refer to [“Deep dive supplier awareness workshops and training”](#) and [“Case study – Development deep dives in Australia to understand maturity and next steps”](#) for more information). Workshops were held in Australia, Hong Kong, China and the UK. In Brazil, Goodman has continued to use a third party consultant to review the compliance of our General Contractors and their sub-contractors in relation to safety regulations on construction sites and our properties.

This year we reviewed second tier risk assessment (refer to [“Maturing our understanding of modern slavery risk beyond our first tier suppliers within segments of the second tier of our supply chain”](#) section for more information).

We also distributed modern slavery pilot surveys to Group corporate suppliers to identify any areas of risk. Surveys were sent to our IT suppliers, our outsourced shared services provider based in the Philippines, audit firms and banks. Additionally, we conducted a deeper review of select audit firms, including one-on-one meetings to gain a deeper understanding of their policies and processes. In FY2025, we will analyse the findings to determine next steps.

# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## ENHANCING SUPPLIER ENGAGEMENT AND AWARENESS THROUGH WORKSHOPS AND TRAINING

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
External capacity building – educate suppliers	Provide training and raising the awareness of our suppliers through Factsheets, posters, online training, and one-on-one workshops.	Create regional versions of the Factsheet and make available to high risk suppliers. Run online localised supplier training sessions targeting high risk suppliers that lack awareness and maturity.

Supplier capacity building through engagement, awareness and training are critical components of our modern slavery program for high risk suppliers. In FY2024 we have used multiple tools to engage with our suppliers and increase their awareness of modern slavery risk including deep dive workshops, training and a Factsheet. These initiatives are detailed below.

### Deep dive supplier awareness workshops and training

To facilitate open dialogue and foster creative collaboration with our suppliers, one-on-one workshops and training were conducted during FY2024 with strategic supply partners and high-spend general contractors in Australia, Hong Kong, China and the United Kingdom. These workshops focused on sustainable and socially responsible procurement practices, with modern slavery and labour protection being a key agenda item. These workshops provided meaningful discussions with key suppliers and allowed for the exchange of ideas, perspectives, and best practice to deepen understanding.

Below is a summary of the deep dive supplier workshops and training:

+ **Australia:** workshops were conducted with strategic high-spend general contractors. We documented observations, strengths and opportunities. Refer to the following [Case Study](#) for more details.

+ **Hong Kong:** workshops were conducted with two of our property asset management (facilities) suppliers focusing on raising awareness of sustainable sourcing and labour protection. One of these workshops was used to create a pilot program with a supplier, who we engage for property (facilities)

management to address second tier supplier risk (refer to [“Maturing our understanding modern slavery risk beyond our first tier suppliers within segments of the second tier of our supply chain”](#) for more information).

- + **China:** a workshop was conducted with one of our general contractors involved in an existing development project, focusing on raising awareness of sustainable sourcing and labour protection.
- + **United Kingdom:** a training session was delivered by Unseen, a leading UK anti-slavery charity, to one of our UK general contractors, and their internal construction team to raise awareness of modern slavery prevention in the construction sector. The feedback from our general contractor was positive and they are planning on Unseen delivering further training for their wider team.
- + **Group:** a training session was conducted with a shared services support supplier based in the Philippines, with an emphasis on our expectations of suppliers in relation to respecting human rights.

These targeted workshops and training have been essential in reinforcing our commitment to addressing modern slavery and promoting ethical practices and sourcing. Online supplier training modules will be developed in FY2025 covering and reinforcing the key topics and messages from these workshops.



Goodman supplier training



Unseen supplier training

## CASE STUDY

### Development deep dives in Australia to understand maturity and next steps

The Australian developments team as part of their sustainability journey embarked on a new approach to general contractor engagement in FY2023, by introducing an engagement questionnaire to address not only issues relating to capability and financial stability, but with a refined focus on broader sustainability elements to identify alignment and any opportunities for improvement. The questionnaire covers environment, social and governance, modern slavery, social procurement, inclusion and diversity. The questionnaire was issued to our top 12 general contractors by contract value in FY2023 with our high-spend general contractors meeting the nominated spend threshold being invited to a four hour deep dive

workshop to discuss the topics covered in the questionnaire. In FY2024, we continued this initiative and again facilitated deep dive workshops with general contractors who met the spend threshold.

The outcomes of the workshops have been documented to identify any relative strengths, opportunities for improvement and next steps. The team also prepared an observations and benchmarking summary which was provided to the general contractors who participated in the workshops or questionnaires to share our assessment of any gaps and recommendations to close out these gaps. The deep dive workshops identified that many of our general

contractors are at the beginning of their sustainability journey including human rights and modern slavery but are committed to increasing their awareness and capabilities. Some of the next steps may include sharing policies, follow up meetings and additional training. The Property Council of Australia’s “Pathway to Respecting Human Rights and Addressing Modern Slavery Risks” (as described under “[Continued industry collaboration](#)”) will be shared with suppliers to provide awareness of practical measures they can implement to manage modern slavery risk.

## ANNUAL DEVELOPMENT CONTRACTOR REVIEW OBSERVATIONS



### MODERN SLAVERY

Modern Slavery policies are well established

There is a varying approach to internal and supply chain training and education

Mixed awareness and understanding of supply chain migrant employment.



## ANNUAL DEVELOPMENT CONTRACTOR REVIEW OBSERVATIONS



Factsheet

In FY2023, to enhance supplier awareness we developed a Modern Slavery Factsheet (Factsheet) which explains the risk of modern slavery, our expectations of suppliers with regard to respecting human rights and preventing modern slavery, and our grievance mechanism. In FY2024, our regional teams have started to create customised and translated (where required) versions of the Factsheet for suppliers. More details follow.

CASE STUDY

Incorporating the modern slavery factsheet

- + **Australia:** the Factsheet is distributed to all property asset management suppliers and incorporated into SinePro, our contractor induction app.
- + **Hong Kong:** the Factsheet is included in purchase orders and contracts, and suppliers are sent a separate declaration to sign, confirming that they have read and understood the document.
- + **China:** the Factsheet is included in the safety/site induction pack, which suppliers must sign off before attending the site.
- + **Japan:** the Factsheet is included in surveys.
- + **United Kingdom:** the Factsheet is emailed directly to suppliers.
- + **United States:** the Factsheet is integrated into supplier surveys.
- + **Brazil:** the Factsheet is incorporated into contracts and vendor portal declarations.

This tailored approach ensures that the Factsheet is effectively utilised across all regions, reinforcing our commitment to combating modern slavery in our global supply chains.

**MODERN SLAVERY FACT SHEET**  
現代の奴隷制の事実

グッドマンのコミットメント

グッドマンは、人を強制、脅迫、詐欺的行為等により搾取し、自由を奪う現代の奴隷制がすべての産業とセクターで発生し得ることを認識しています。グッドマンは、現代の奴隷制が基本的な人権に対するグローバルなリスクであり、このリスクの管理が継続的な責任であることを認識しています。当社の人々と、サプライチェーンのすべての労働者の人権保護は、当社の価値観と、安全性および持続可能性へのコミットメントに一致するものです。

グッドマンは、サプライチェーンにおける人権および現代の奴隷制に関連するリスクを特定し、軽減するためのグローバルな取り組みについて毎年報告しています。私たちは、サプライチェーンにおける現代の奴隷制のリスクを減らすために、一連のイニシアティブを実施することを約束しています。皆さまの協力を得ることで、このリスクをさらに減らすことができます。

**現代の奴隷制 - 事実**

現代の奴隷制は、強制労働、債務による束縛、詐欺的な採用、人身売買、児童労働などの労働権侵害を通じて発生する深刻な搾取の形態です。現代の奴隷制の場合、脅迫、暴力、強制、詐欺、権力の乱用のため、被害者は拒否したり逃げたりすることができません。

最新のグローバルな推定によると、4,960万人の人々が現代の奴隷制の下で生活しており、そのうち2,760万人が強制労働に従事しています。これは、不動産業界や建設業界での搾取を含む可能性があります。

国際労働機関 (ILO) は、不動産業界および建設業界を、現代の奴隷制のリスクが高いセクターとして特定しています。現代の奴隷制は、世界における不動産業界および建設業界のさまざまな部分で発生する可能性があります。これは、これらの業界が、危険な仕事、基本的な技能しか必要とされない仕事、または低賃金の仕事を労働者が遂行することに依存し、また、労働者の採用が下請け業者から扱えないまま外注されることが多いことに起因します。

**統計**

- 現代の奴隷制下にある人々: 4,960万人
- 強制労働下にある人々: 2,760万人
- 被害者は女性および少女: 54%
- 被害者は子供: 4.1人に1人

ターゲット 8.7: 現代の奴隷制、人身売買、児童労働を排除する

2016年以降、現代の奴隷制下にある人々が1,000万人増加

出典: 国際労働機関 (ILO)、国連、ウォークフリーファンデーション

**FICHA INFORMATIVA SOBRE A ESCRAVIDÃO MODERNA**

Compromisso de Goodman

A Goodman reconhece que a escravidão moderna pode ocorrer em todas as indústrias e setores onde coerção, ameaças ou engano podem ser usados para explorar as vítimas e minar ou privá-las de sua liberdade. A Goodman reconhece que a escravidão moderna é um risco global aos direitos humanos e trabalhistas e que gerencia esse risco é uma responsabilidade contínua. A proteção dos direitos humanos de nosso pessoal e de cada trabalhador de nossa cadeia de suprimentos está alinhada com nossos valores e nosso compromisso com a segurança e a sustentabilidade.

A Goodman reafirma anualmente os esforços globais para identificar e mitigar riscos em nossa cadeia de suprimentos relacionados aos direitos humanos e escravidão moderna. Estamos comprometidos com a implementação de uma série de iniciativas para reduzir o risco de escravidão moderna em nossa cadeia de suprimentos. Com sua ajuda, podemos agir juntos para reduzir ainda mais esse risco.

**Escravidão Moderna - fatos**

A escravidão moderna é uma forma grave de exploração, que pode ocorrer por meio de abusos dos direitos trabalhistas, incluindo trabalho forçado, servidão por dívida, recrutamento enganoso, tráfico humano e trabalho infantil. Nos casos de escravidão moderna, a pessoa não pode recusar ou sair por causa de ameaças, violência, coação, engano ou abuso de poder.

As últimas estimativas globais indicam que 49,6 milhões de pessoas são vítimas de escravidão moderna e 27,6 milhões de pessoas vítimas de trabalho forçado, que pode incluir exploração em propriedades e construções. A Organização Internacional do Trabalho identificou os setores de propriedade e de construção como de alto risco para a escravidão moderna. A escravidão moderna pode ocorrer em várias partes da indústria global de propriedades e construção, onde há dependência de trabalhadores para realizar trabalhos que podem ser perigosos, qualificados ou de baixa remuneração e onde o recrutamento de mão de obra é frequentemente terceirizado com falta de visibilidade sobre os subcontratados.

**AS ESTATÍSTICAS**

- 49,6 MILHÕES de pessoas sob escravidão moderna nos dias atuais
- 27,6 MILHÕES de pessoas em trabalhos forçados
- 54% das vítimas são mulheres e meninas
- 1 EM CADA 4 vítimas são crianças

HÁ MAIS 10 MILHÕES DE PESSOAS VÍTIMAS DE ESCRAVIDÃO MODERNA DESDE 2016

Fonte: A Organização Internacional do Trabalho, Organização das Nações Unidas e Fundação Walk Free.

GOODMAN.COM



# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## INCREASING WORKER AWARENESS THROUGH INITIATIVES SUCH AS TRAINING AND PROMOTING THE AVAILABILITY OF OUR GRIEVANCE MECHANISM

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
Engage with workers on our sites to understand their experience, if any, of modern slavery	<p>Educate workers in relation to their rights and seek to understand any modern slavery or human rights impacts that they experience.</p> <p>Raise awareness of our grievance mechanism for our site based workers in identified high risk projects or properties.</p>	<p>Install signs at our high risk project sites (in local languages) in relation to modern slavery and labour law compliance issues and how to raise a concern.</p> <p>Investigate all concerns raised in relation to modern slavery via our grievance mechanism.</p> <p>Make available to our suppliers online training for site based workers across regions.</p>

Goodman recognises that worker awareness in our supply chain is an important part of our modern slavery program and this year we focused on training and promoting the availability of our grievance mechanism. We reconfirmed the accessibility of our grievance mechanism with concerns being able to be raised via email or our local websites (including anonymously) and promoted in various ways including training, awareness material and contractor sign-in processes. The communication of our grievance mechanism channel creates a safe and transparent environment for workers to voice their concerns (including anonymously). In FY2025, we will continue exploring ways to improve awareness and plan to make online training available to suppliers.

This year, no concerns were raised in relation to modern slavery but we are committed to reviewing any concerns that are received.

LABOR PROTECTION

劳工保护

嘉民, 一个合规且有道德的商业伙伴

嘉民承诺在我们的运营和供应链中, 严格恪守商业道德并遵守相应的法律。嘉民强烈支持在供应链中遵守劳动法, 促进所有工人获得公平公正的待遇。嘉民不容忍其在全球供应链中出现的不遵守劳动法的违规情况, 坚信所有工人都有权获得相应的报酬和安全的工作环境。如果你发现嘉民的供应商、代理商或第三方存在不道德, 不合法或不正当的行为, 我们鼓励你上报这些问题, 以便得到妥善处理。

如何报告忧虑

我们鼓励供应商, 代理商和第三方向嘉民报告以下任何情况:

- ❶ 不诚实、欺诈、腐败、非法或不道德的行为
- ❷ 任何不安全的行为或不遵守劳动法, 包括:
  - 低于最低法定年龄的工人
  - 工人未得到符合劳动法规定的公平待遇或报酬
  - 工人工作时长超过劳动法规定的最大工时数
  - 工人不能根据适用的劳动法终止雇佣关系而被迫工作的情况

联系方式:

电子邮箱: [ethicalconcerns@goodman.com](mailto:ethicalconcerns@goodman.com)  
 网站: 您也可以通过网站上“联系我们”提出您的关切, 网站地址: [www.goodman.com](http://www.goodman.com)




Signage in China

## CASE STUDY

### Supply chain worker awareness initiatives

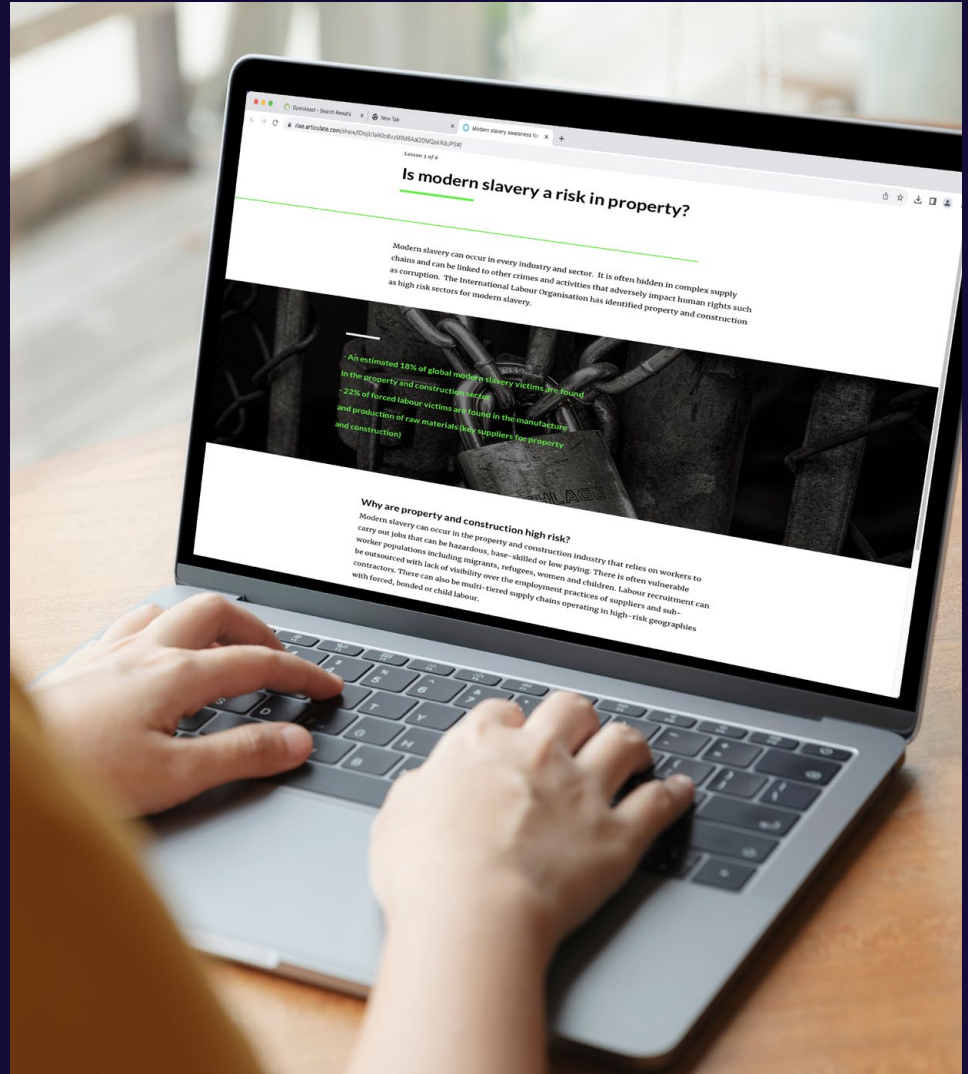
#### Contractor induction training

In Australia, we continue to make available on our contractor induction app, SinePro, an online modern slavery training module for onsite workers to complete before accessing a Goodman stabilised property. This module increases the awareness of modern slavery and our grievance mechanism for our onsite property asset management suppliers.

#### Awareness through signage

We continue to use signage (physical and digital) in local language at development sites in Brazil and at our stabilised properties in Brazil, Hong Kong, China and the United States to improve awareness of modern slavery and labour law issues for workers in our supply chain and how to report concerns to us.

As our development sites are controlled by our general contractors it is not always possible for Goodman to place signage on site. To overcome this issue, in the United Kingdom, Goodman partnered with a general contractor, to install co-branded signage at a development site to reflect our shared commitment.



SinePro contractor induction training

# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## MATURING OUR UNDERSTANDING OF MODERN SLAVERY RISK BEYOND OUR FIRST TIER SUPPLIERS WITHIN SEGMENTS OF THE SECOND TIER OF OUR SUPPLY CHAIN

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
Mature our understanding of modern slavery risk beyond our first tier suppliers	Develop a plan to prioritise our review of suppliers beyond our first tier. Explore the opportunity to work with the Cleaning Accountability Framework.	To be finalised and submitted to our modern slavery working group. Pick one high risk category of second tier supplier to be a pilot for engagement.

Recognising the complexities of our extended supply chain, this year projects were continued or initiated to better understand and mitigate modern slavery risks within segments of the second tier of our supply chain in Australia, Hong Kong, the United States and Brazil.

+ In **Australia**, modern slavery questionnaires continue to be issued to our first tier property asset management suppliers through Om3 to identify any risk exposure. The questionnaires are completed as part of pre-qualification and include questions about the suppliers and subcontractors engaged by our first tier suppliers (our second tier supply chain). Questions include whether their suppliers or subcontractors engage overseas suppliers or manufacturers, whether they are importing raw materials from overseas, and if they directly employ workers who are living overseas. Our findings revealed that whilst 49% of our property asset management suppliers engage subcontractors, there is limited visibility and awareness amongst our direct suppliers regarding their extended supply chain. A key learning from this assessment is the need to further collaborate with our first tier suppliers to enhance their understanding of modern slavery risks, particularly when sourcing materials and labour from overseas.

- + In **Hong Kong**, we conducted a pilot with our property (facilities) management provider, a key supply partner, who we engage to provide maintenance services. We designed a bespoke modern slavery survey which was issued to their suppliers (our second tier suppliers) to identify any modern slavery risk indicators. The completion rate is 82% and responses are being reviewed to determine next steps. This may include targeted awareness programs for second tier suppliers and higher engagement with them to improve visibility and understanding of potential risks. Additionally, we plan to roll out this pilot with another supplier in FY2025.
- + In the **United States**, we launched a pilot program to track the origin of major products in some development tenders. As part of this pilot, we have updated our tender documents to require prospective suppliers to provide a complete list of the major products to be sourced for the project, along with their origins.
- + In **Brazil**, we continue to include contractual clauses with our general contractors (first tier suppliers) that their suppliers and subcontractors (our second tier suppliers) complete modern slavery training. They are also required to acknowledge their understanding of our Modern Slavery Factsheet and other compliance policies through our supplier onboarding portal.

We plan to use the learnings from these projects to refine our understanding of modern slavery risk beyond our first tier suppliers and how to best influence our second tier supply chain in FY2025 and beyond. We explored the opportunity to work with the Cleaning Accountability Framework but it was assessed that the partnership was not fit for purpose this year.

# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## INCREASING INTERNAL AWARENESS THROUGH TARGETED MODERN SLAVERY TRAINING

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
<p><b>Internal capacity building – improve internal understanding of modern slavery and our framework within the Group</b></p>	<p>Run targeted training for site based team members who directly engage with suppliers to enhance their awareness.</p> <p>Undertake ongoing Board training including in relation to remediation.</p>	<p>Training sessions for site based team members on high risk projects or those who directly procure from high risk sectors to include at least 70%.</p> <p>Provide one Board training session in relation to modern slavery for Goodman Group Boards.</p>

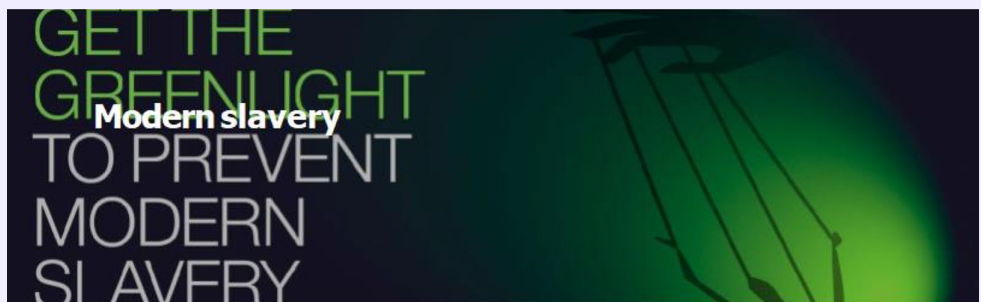
Training and awareness of our people are critical in addressing modern slavery risk. In previous years our people have been provided with communications on the risks and responsibilities relating to modern slavery, access to a comprehensive modern slavery online module (including the Goodman Group Boards) or received face-to-face training.

This year we focused our efforts on developing customised training materials targeted at those teams who attend Goodman properties or directly engage with suppliers including developments, property asset management and procurement. This training was provided in Australia and China this year and will be provided to other regions in FY2025. Following up from the training provided to our UK property asset management team in FY2023 by Unseen, a leading UK anti-slavery charity, a training session was provided to our UK developments team this year.

These internally and externally run interactive training sessions with current case studies provided our people with a deeper understanding of modern slavery and the knowledge to identify red flags and how to take appropriate action, including raising concerns through our whistleblowing mechanisms. There was a high level of engagement and questions during the training sessions and positive feedback was received. This training has strengthened our ability to detect and address modern slavery and reinforces our commitment to respecting human rights.

The Audit, Risk and Compliance Committee continues to receive reporting on modern slavery initiatives and actions at least quarterly. Training is planned for key management with a focus on the actions to be taken if a modern slavery issue was identified including addressing any impacts and preventing future harm.

### SIGNS TO SPOT MODERN SLAVERY



Modern slavery internal training

# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## CONTINUED INDUSTRY COLLABORATION

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
Continue industry collaboration	Participate in Property Council of Australia modern slavery group. Identify similar groups in other regions.	Attendance at each meeting during the year. Research relevant industry groups per region. Hold one session with an NGO or similar organisation.

Goodman acknowledges that industry collaboration is an important part of effective change by enabling us to drive strategic initiatives, leverage collective action and gain valuable insights from the industry. Goodman continues to be actively involved in the Property Council of Australia (PCA) Modern Slavery working group and Goodman representatives attended all meetings during the year.

Goodman has been involved with the PCA Modern Slavery Working Group since its inception and it is recognised as a prime example of “good practice” in the [Good Practice Toolkit: Strengthening modern slavery responses](#). Our participation and active involvement in the working group enables us to engage with other property companies in Australia to understand modern slavery risks and collectively identify opportunities for adopting best practices in our industry. One example is the collaboration with Edge Impact in FY2024 to develop the “Pathway to Respecting Human Rights and Addressing Modern Slavery Risks” to provide guidance for suppliers to implement practical measures to understand risk, educate their people and collaborate with their supply chain.

In the United Kingdom, we continued to collaborate with Unseen, a UK charity, who work with businesses to provide training in modern slavery awareness. Unseen facilitated training this year with our UK developments team and one of our general contractors and their internal construction team to reinforce the importance of modern slavery prevention in construction.

We are continuing to explore similar groups in our other regions.



# SECTION 06 | Actions taken to assess and address modern slavery risks, including due diligence and remediation (cont.)

## REVIEWING OUR REMEDIATION PROCESS TO CONSIDER HOW WE WOULD RESPOND TO ANY INSTANCES OF MODERN SLAVERY, PROVIDE REMEDY, AND PREVENT FUTURE HARM

FY2024 goals	FY2024 approved actions	FY2024 effectiveness measure
Test our remediation process	We will conduct a mock scenario to test the effectiveness of our remedy pathway.  We aim identify any gaps or areas that need improvement.	One test to be undertaken during the reporting year.

This year we focused on reviewing our remediation pathway to identify the types of steps we would undertake if an instance of modern slavery was identified including being responsive to impacted individuals and preventing future harm. We are committed to further assessing our preparedness in FY2025 and to identify any gaps or areas that need further improvement.

To support an effective response to any potential instances of modern slavery we determined the key actions required to review any concerns, redress any impacts on affected individuals and prevent future harm. We sought feedback from key stakeholders on our key assessment considerations including understanding the facts, identifying responsible parties and our potential involvement in the harm, and determining appropriate actions (including reporting, remedial actions, legal advice and/ or expert advice and support). Our review also contemplated preventative measures to mitigate the risk of similar incidents in the future including supplier actions and improved practices, changes to procurement processes and improved supplier monitoring. Our refined remedy pathway reflects our ongoing commitment to addressing modern slavery and providing a remedy to impacted individuals.

The key elements of our remedy pathway are detailed below:

### TRUSTED, ACCESSIBLE AND CONFIDENTIAL

Trusted, accessible and confidential grievance mechanism to elevate and address worker concerns, and to act as an early warning system for modern slavery risks. Concerns can be raised via email or our local websites (including anonymously) and promoted through training, awareness material and contractor sign-in processes.

### INDEPENDENT ADVICE AND SUPPORT

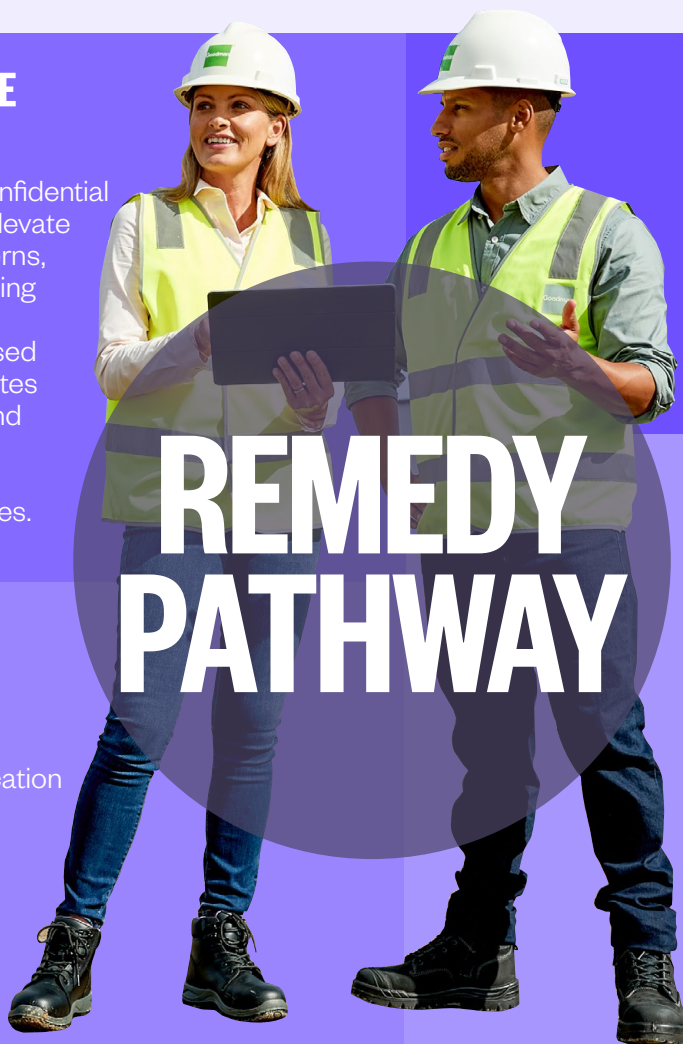
Working with regulatory authorities and expert advisors and if needed, mediators and negotiators, as and when appropriate and report any issues to the Audit, Risk and Compliance Committee and escalate to the Boards where required.

### VICTIM SAFETY, PROTECTION AND CONSENT

Responding to the identification of suspected instances of modern slavery that seeks to ensure the safety and privacy of the victim and seeking their involvement and input into any remediation action plans.

### HUMAN RIGHTS BASED APPROACH

Following a victim-centric approach, and seeking to the extent possible, to restore the affected individual/s to the position they were in before the human rights impact occurred. Make good the harm through access to facilities (e.g. legal advice, counselling, temporary accommodation), assistance in compensation (e.g. payment of owed wages, refund of visa costs or recruitment fees, repatriation) or other actions (e.g. apology), and take actions to prevent future harm.



**REMEDY  
PATHWAY**

## SECTION 07 | Assessing the effectiveness of our actions and looking forward

Goodman acknowledges that managing modern slavery requires an ongoing commitment, effective engagement with our suppliers and collaboration with both the industry and NGOs. Goodman recognises that those at the top of our supply chain can assist in cascading conditions that encourage lower tier suppliers to adopt responsible practices.

Our modern slavery working group reviews and assesses the effectiveness of our actions to address modern slavery risk. We outlined in SECTION 06 the actions we undertook in FY2024. Many of these actions are foundational and ongoing and support our commitment to managing modern slavery risk. Some of these measures were also more complex risk actions. Both our foundational and complex risk actions were assessed as being effective in managing modern slavery risk this year. As a result, we will continue to measure our effectiveness against these goals and actions in FY2025 with some refinement as detailed below:

FY2025 goals	FY2025 actions	FY2025 effectiveness measure
Confirm that our key policies, precedent contracts and procurement processes are responsive to modern slavery risk	Review our key policies, precedent contracts and procurement processes (including supplier pre-qualification, tendering, onboarding and contracting) to confirm alignment with best practice and that they are effectively addressing modern slavery risk.	Confirm review and update of key policies, precedent contracts and procurement processes as required and evaluate compliance as part of relevant reviews in Goodman's internal audit program.
Enhance our understanding of our supply chain risk and develop action plans where needed	Continue to assess the risk of modern slavery across our global supply chain through high risk supplier due diligence and engagement (e.g. questionnaires, declarations, response analysis or supplier workshops) and external resources published by NGOs and other organisations.	Confirmation of supply chain risk factors based on supplier due diligence and other external resources.
Enhance supplier engagement and awareness	Improve supplier awareness through training and other awareness mechanisms including workshops and Factsheets.	Make available to high risk suppliers localised training and awareness material and facilitate workshops where appropriate.
Increase the awareness of workers in our supply chain	Consider how to best educate workers in our supply chain in relation to modern slavery and raise awareness of our grievance mechanism (including sign in processes, posters and/or other mechanisms as appropriate).	Make available to workers in our supply chain information in relation to modern slavery and how to raise a concern and investigate all modern slavery concerns.
Mature our understanding of modern slavery risk beyond our first tier suppliers	Develop a plan to prioritise our review of suppliers beyond our first tier.	Pick one high risk category of second tier supplier to be a pilot for engagement.
Improve internal awareness and understanding of modern slavery	Run targeted training for teams who attend Goodman properties, directly engage with suppliers or key management to enhance their awareness. Continue to make the Audit, Risk and Compliance Committee aware of Goodman's goals and actions.	Provide training and seek feedback on whether it improved awareness and understanding. Quarterly reporting to the Audit, Risk and Compliance Committee.
Continue industry collaboration	Participate in Property Council of Australia modern slavery group. Identify similar groups or NGOs in other regions.	Attendance and active engagement at each meeting during the year. Research relevant industry groups and NGOs and facilitate engagement where appropriate.
Remediation preparedness	Review our preparedness and response approach in the event a modern slavery issue is identified including providing remedy and taking corrective actions.	Review to be undertaken and any gaps or areas that need improvement actioned.

## Goodman Group

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### Goodman Industrial Trust

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GMG

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