

JOINT MODERN SLAVERY STATEMENT 2021

Goodman acknowledges that modern slavery is a global risk to human rights.

It is a serious form of exploitation present in global supply chains through a number of labour rights abuses including forced labour, debt bondage and child labour. Like many organisations, Goodman is not immune to the risk of modern slavery in our operations and supply chains where coercion, threats or deception may be used to exploit victims and undermine or deprive them of their freedom.

An estimated 18% of modern slavery victims are found in the construction industry and 22% of forced labour victims are found in the manufacture and production of raw materials – key suppliers to the property and construction industry.

We are committed to good business ethics across our operations and global supply chains. We identify human rights as one of our environmental, social and governance (ESG) risks. The protection of human rights of our people and every worker in our supply chain is aligned with our values and our commitment to safety and sustainability.

Globally, working with our people, our suppliers and other stakeholders, we want to be vigilant and contribute to the fight against modern slavery.

This Statement has been approved by the Goodman Group Boards on behalf of the reporting entities covered by this Statement on 9 December 2021.



Greg Goodman
Group Chief Executive Officer
December 2021



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OUR 2021 HIGHLIGHTS

In 2021, we focused on supply chain ethics and undertook the following measures:



Launched our modern slavery strategy and commitments with our regional teams and expanded our working group with regional champions



Reviewed our global supply chains and set minimum global standards for due diligence and remediation



Revised our global Statement of Business Ethics (Supplier Code of Conduct) to make clear the expectations of suppliers with regard to protecting human rights and preventing modern slavery. We also commenced a review of our procurement contracts to incorporate our expectations of suppliers



Trained our people about the risks of modern slavery and raised awareness of our whistleblower procedures



Commenced the implementation of a Sustainable Sourcing Framework which includes our approach to safety, sustainability, environment, modern slavery, and social standards.

**'THERE IS AN ESTIMATED
40 MILLION PEOPLE LIVING
IN MODERN SLAVERY TODAY.'**

Source: International Labour Organisation



About our statement and reporting entities

This is Goodman’s Modern Slavery Statement (Statement) for the financial year 1 July 2020 – 30 June 2021 (FY21) 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 constitutes Goodman Group’s joint Modern Slavery Statement.

Goodman Group (Goodman or Group), is a triple stapled entity comprising the Australian company, Goodman Limited, the Australian trust, Goodman Industrial Trust and the Hong Kong company, Goodman Logistics (HK) Limited. Their stapled securities are listed and traded on the Australian Securities Exchange under the code GMG. The Boards of GL and Goodman Funds Management Limited, as the responsible entity of GIT, comprise the same directors while GLHK has a distinct Board with some overlap (together they are referred to as the Goodman Group Boards).

This Statement has been prepared for Goodman and the respective entities over which Goodman had control for accounting purposes during the financial year ended 30 June 2021. Goodman also submits this joint Statement on behalf of Goodman UK Holdings Limited.

In summary, having regard to the Group’s stapling arrangements the reporting entities for the purposes of this Statement are:

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 chains and to maintain responsible and transparent supply chains. References to “Goodman”, “Group”, “us”, “we”, or “our” in this Statement are references to the Goodman Group and each of the reporting entities unless specified otherwise.

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



Entity	Reporting status
Goodman Limited (GL) ABN 69 000 123 071	Mandatory reporting entity in Australia
Goodman Funds Management Limited (GFML) ABN 48 067 796 641 AFSL Number 223 621 – the responsible entity for Goodman Industrial Trust (GIT) ARSN 091 213 839	Voluntarily reporting in Australia
Goodman Logistics (HK) Limited (GLHK) ARBN 155 911 149 Company No. 1700 359	Voluntarily reporting in Australia
Goodman UK Holdings Limited (GUKH)	Mandatory reporting entity in the UK



Our structure, operations and supply chains

Structure

Goodman comprises Goodman Limited, Goodman Industrial Trust and Goodman Logistics (HK) Limited and their respective subsidiaries which contributed to its total annual consolidated revenue as at 30 June 2021. Refer to the [Goodman Group Annual Report 2021](#) for further information.

Governance

Goodman is committed to the highest standards of corporate governance and recognises 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
 - + GFML as the responsible entity for GIT;
 - + GLHK,
- (collectively, Goodman Group Boards).

The Goodman Group Boards oversee and regularly review our corporate governance framework to address our obligations as a responsible corporate entity. Refer to Goodman's [Corporate Governance Statement 2021](#).

Goodman's approach to assessing and addressing human rights and modern slavery risk is managed under the same governance structure for managing Goodman's ESG risks and opportunities, as outlined on the next page.

GOVERNANCE STRUCTURE

Goodman Group Boards

Provides strategic direction and oversees the effective management and performance of Goodman. Holds the ultimate responsibility for overseeing Goodman's sustainability strategy and approving our Modern Slavery Statement.

Risk and Compliance Committee

Responsible for overseeing the implementation and effectiveness of Goodman's risk, compliance and safety frameworks. Has delegated authority from the Goodman Group Boards to assist in the oversight of risk, compliance and development and asset risk management, and ESG matters, including our approach to modern slavery and human rights issues.

Group Chief Executive Officer (CEO)

Responsible for the day-to-day management of Goodman and implementation of strategic objectives. Accountable for managing modern slavery and human rights risks.

Corporate Services Committee

Management Committee for the Group CEO which oversees Goodman's core corporate functions including risk, compliance, development, and asset risk management including sustainability, ESG matters and safety. Has oversight of any actions to assess and manage modern slavery and human rights issues.

Modern slavery working group

A cross-functional and multi-jurisdictional group including representatives globally from the business units of Procurement, Legal and Compliance, Risk and Sustainability who are responsible for the development and implementation of policies, practices and reporting on modern slavery across our operations and supply chain. The modern slavery working group is overseen by the Executive Director – Corporate, Group Chief Financial Officer, Chief Risk Officer, and Group Head of Legal and Company Secretary. Progress against our modern slavery strategy is regularly reported to the Corporate Services Committee, Group CEO and Risk and Compliance Committee. This working group meets regularly to drive the continuous improvement in Goodman's approach to tackling modern slavery risk.

The above governance structure applies to all entities owned and controlled by the Group and covered by this Statement.

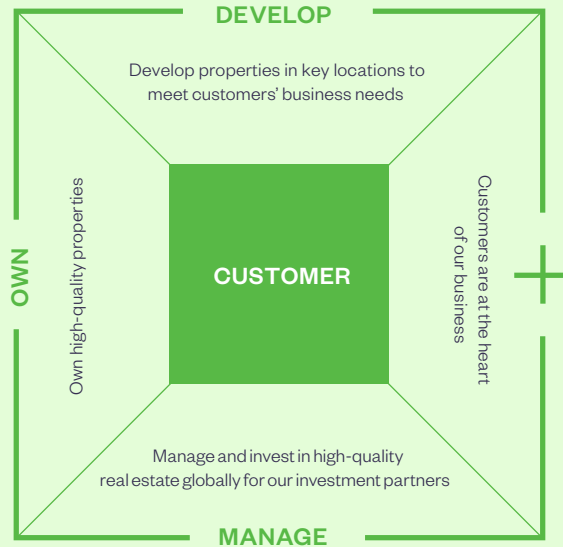
Operations

Goodman is one of the world's leading industrial property groups. Goodman is focused on its proven business model of owning, developing and managing industrial property and business space in its chosen key markets around the world. Goodman has operations spanning Asia Pacific, Europe and the Americas. Goodman's purpose is to make space for its stakeholders' greatest ambitions. This purpose is executed through Goodman's integrated business capabilities model – "own+develop+manage", where its customers' needs for sustainable solutions and service excellence in high quality locations, is at the core.

We employ over 900 people worldwide and operate out of 14 countries, 26 cities and 30 offices. The majority of Goodman's people are employed on permanent contracts by subsidiaries operating in each country in which we are present. Employees, whom we refer to as team members, perform a diverse range of job functions including property services, asset management, development and project management, investment management, human resources, information technology, risk management, legal, compliance, company secretary and custodial services, marketing, stakeholder relations and finance, tax, valuations and treasury functions. Our people are our greatest asset – with local market knowledge and a value set that promotes integrity, sustainability, determination, and innovation.

Goodman continues to have the people, scale, expertise, infrastructure and capital to develop long-term relationships with customers and partners around the world. Goodman works closely with all our customers, our team members, third party suppliers and investment and community partners.

As at 30 June 2021, Goodman had total assets under management of AUD\$57.9 billion, 363 business properties under management and approximately 1,600 customers. We have a diverse range of global and local customers within the e-commerce, logistics, retail, consumer goods, automotive, pharmaceutical and technology industries.



900+
PEOPLE
WORLDWIDE

44%
FEMALE

56%
MALE

WORKFORCE PER SEGMENT

10%
THE
AMERICAS

24%
EUROPE /
UK

28%
ASIA

38%
AUS /NZ



1,600+
CUSTOMERS
GLOBALLY

GLOBAL PRESENCE*

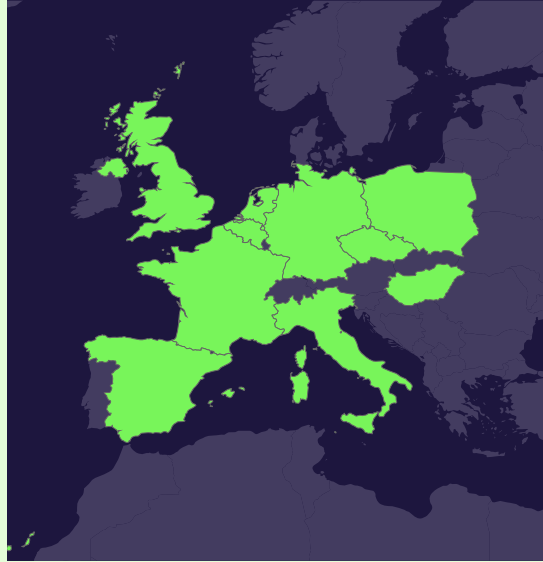


THE AMERICAS

\$5.0BN
AUM

20
PROPERTIES

ALLENTOWN
LOS ANGELES
NEW JERSEY
SAN FRANCISCO
SÃO PAULO



EUROPE/UK

\$9.1BN
AUM

108
PROPERTIES

BIRMINGHAM
BRUSSELS
DÜSSELDORF
HAMBURG
LONDON
LUXEMBOURG
MADRID
MILAN
PARIS

OUR NETWORK

\$57.9BN

TOTAL AUM

363

PROPERTIES



ASIA

\$20.0BN
AUM

69
PROPERTIES

BEIJING
CHENGDU
CHONGQING
GUANGZHOU
HONG KONG SAR
OSAKA
SHANGHAI
SHENZHEN
TOKYO



AUS/NZ

\$23.8BN
AUM

166
PROPERTIES

AUCKLAND
BRISBANE
MELBOURNE
SYDNEY

The Goodman Foundation

The Goodman Foundation also brings together our people, properties and resources to address disadvantage in the world and make a tangible sustainable difference to people's lives. By supporting like-minded charities and funding projects with clearly defined timelines and outcomes, we are able to provide tangible support where it is needed most.

Additional information about Goodman can be found on our website at www.goodman.com.

Our supply chain

Our supply chain consists of small, medium, and large-scale suppliers with whom we partner to help deliver our global property development, property management and funds management activities. Goodman has established extensive supply chain relationships across each of its operating regions. We engage extensively with our supply chain throughout the lifecycle of properties, from initial development through to operation and management.

Goodman directly engages 11,928 suppliers globally to provide goods and services for our business, with an annual spend of approximately AUD\$4 billion across three key areas of our business:

SUPPLY CHAIN

ASSET MANAGEMENT

The repair and maintenance of our 363 properties. Suppliers include cleaning, security services, waste management, heating, ventilation and air conditioning (HVAC), fire safety, plumbing, landscaping and repair and maintenance.

DEVELOPMENT

Development of new properties and re-development of existing properties with work-in-progress of AUD\$10.6 billion*. This encompasses the development process, from sourcing property for our customers, master planning, architecture, design and project management. Suppliers include General Contractors¹ and the parties they contract such as specialist subcontractors for the supply of raw materials used in construction and for construction labour.

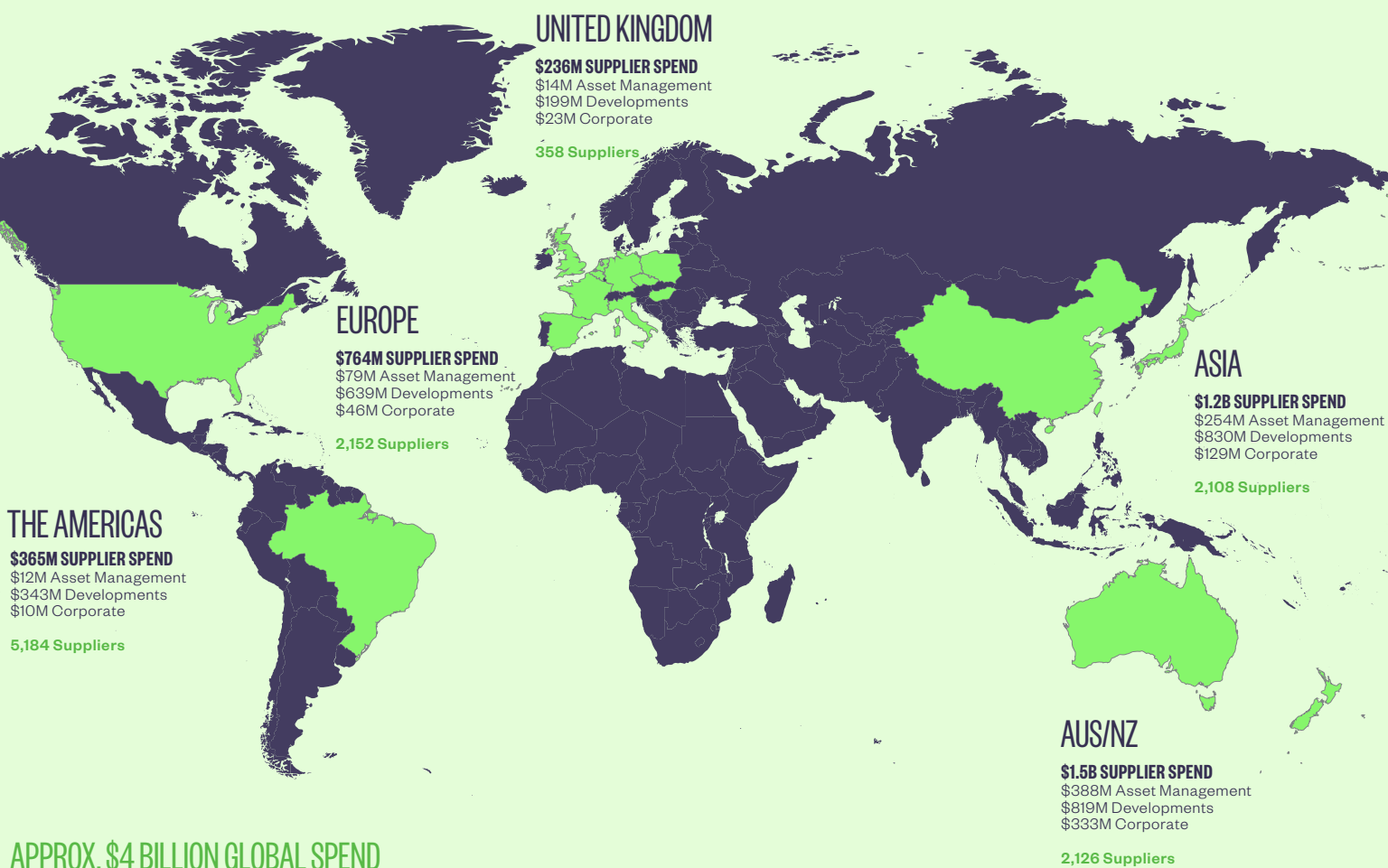
OPERATIONAL AND CORPORATE

Operating expenses to run our business which includes professional and financial services, information technology equipment and support, office stationery and furniture, marketing merchandise, and travel.

* As at 30 June 2021

¹ The definition of "General Contractor" is a person or business entity that contracts to be in charge of a building project which usually involves the use of subcontractors.

GOODMAN SUPPLY CHAIN AND SUPPLIER SPEND



APPROX. \$4 BILLION GLOBAL SPEND

11,928 Suppliers
 \$747M Asset Management
 \$2.8B Developments
 \$541M Corporate

* As at 30 June 2021. All figures in Australian dollars.

We report our suppliers by financial reporting segments in accordance with our financial report.

By volume of transactions, asset management has the highest number of separate engagements in our supply chain.

Design and construction of our developments are outsourced and by value this is the most significant area of our supply chain at nearly 70%. Goodman manages this risk by engaging strategic and trusted supply partners with whom we engage on multiple projects globally.

Note – the Americas supply numbers are relatively higher than other regions as the Brazil suppliers include subcontractors invoicing Goodman directly (notwithstanding that they are not directly contracted by Goodman) unlike other regions.

In each country in which we operate, the supply chains below our tier 1 suppliers will involve both domestic and imported elements adding complexity and difficulty to mapping and monitoring supply chains. It is this extended supply chain that has been identified as a potential risk area for modern slavery. Goodman will continue to work with our tier 1 suppliers, where we have the greatest control and influence, to develop awareness and greater transparency of their supply base so that they can best manage risk within their supply sources.

Modern slavery risks in our operations and supply chain

In FY21, Goodman undertook a risk assessment of potential modern slavery risks in our global operations and supply chains to consider the risk that we are causing, contributing to, or directly linked to modern slavery through our operations and supply chains in accordance with the UN Guiding Principles. In conducting this assessment, we focused on modern slavery risks for workers in the context of labour conditions of our direct workforce and labour conditions of indirect labour used in our supply chains. Our review focused on identifying risks to prioritise our efforts where there is greatest impact to people.

In order to inform our assessment of modern slavery risks in our operations and supply chains, we referred to modern slavery data and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and the Walk Free Foundation.

Operations (direct workforce)

Our risk assessment identified that the risk that modern slavery poses in our operations and direct workforce is low and mitigated by a number of controls. As noted previously, the majority of Goodman's people are employed directly on permanent contracts and are skilled professionals. We have verified that all our workers are paid in accordance with applicable industrial relations laws; and all our permanent employees, both full-time and part-time, regardless of position are entitled to short term and long term incentives. Modern slavery risks that relate to our operations and people are assessed in the context of elements of all forms of modern slavery as well as consideration of our people's health and safety, ethical conduct, and equality.

Supply chain

The review of our global supply chains took into account a number of factors to assess the potential risk of modern slavery in our supply chains, including geographic risks from the sectors in which we operate, and the supply chain model used. The property industry is not immune to modern slavery practices where there is high demand for low skilled workers who are vulnerable

to exploitative practices including for security, maintenance, cleaning services and construction labour. Raw materials such as bricks, cement, and manufactured products are often sourced from higher risk geographies that may be associated with poor working conditions, forced labour and child labour. Business models are also often based on outsourcing, which increases the complexity of operations and supply chains and decreases the visibility of labour risks and impacts. Concerns have also emerged for asset managers over tenancies operating in sectors with increased exposure to forced labour and trafficking practices such as hospitality, beauty and other personal services. The procurement of company merchandise is another potential risk factor with products being sourced from higher risk geographies.

COMMON MODERN SLAVERY PRACTICES IN PROPERTY AND CONSTRUCTION



Source: [KPMG and AHRC PCMSG 2020](#).

In developing our risk-based response, Goodman has considered the UN Guiding Principles and prioritised the greatest risks to people, our level of influence, supplier spend and the ability to remediate any potential issues. Our regions have developed their own supply chain maps scrutinising localised industry-based considerations for the region in which they operate such as vulnerable populations, high risk categories of supply and high risk labour supply. The assessment divided our spend into procurement categories which were then screened for risk factors including labour rights, decent work conditions, health and safety, human rights and governance.

Following our assessment, we identified the following attributes which increase vulnerability in our global supply chains:

- + Reliance on vulnerable populations including migrant, low skilled or contract workers for labour in construction, cleaning, security services, maintenance, and landscaping
- + Raw materials used in construction (e.g. bricks, steel and concrete), manufactured products (e.g. solar, electrical and HVAC) and corporate merchandise (e.g. garments) from higher risk geographies with lower human rights standards including transport and logistics
- + Outsourced services with high-risk business models such as sub-contracting and use of third party labour hire agencies resulting in low visibility of labour practices in the supply chain
- + Operating in price competitive and low margin markets.

Goodman has initially focused our attention on our tier 1 suppliers with whom we have a direct relationship which assists us to actively manage these risks. Where we identify trends that may elevate modern slavery risk we view these as an opportunity for collaboration and engagement with our tier 1 suppliers. We acknowledge there may be additional risk of modern slavery amongst our extended supply chain including our tier 2 and tier 3 suppliers and beyond. Where we do not have direct visibility, our approach is to increase the level of engagement and encouragement with our tier 1 suppliers so that they in turn can continue to influence their direct supply chain.





Actions taken to assess and address modern slavery risks, including due diligence and remediation

Our 2021 actions

Over this reporting period, we have made progress in implementing global policies and actions to assist in addressing the modern slavery risks associated with our operations and supply chains. A key action was expanding our modern slavery and human rights strategy and commitments to our global operations in line with our 2030 Sustainability Strategy. As an organisation that procures from a broad and diverse global supplier network, a key focus is developing partnerships with suppliers that operate with aligned values and standards by considering social, environmental and human rights related factors in our procurement decisions.

Goodman has applied a tiered approach to modern slavery which allows for a systematic approach to identifying and managing our risk (as detailed on the next page).

Our response by region

Our regions have adopted policies and procedures to identify and address modern slavery risks in a way that is appropriate for the relevant jurisdiction. Our global approach incorporates the key elements of our human rights and modern slavery program controls. The progress of our regions is set out in the table in the section on how we have assessed the effectiveness of our actions.

MODERN SLAVERY FUNNEL THAT ENABLES US TO HAVE A SYSTEMATIC APPROACH TO MANAGING RISK.

Governance – regional awareness

Raising awareness of modern slavery with our regional teams in the context of relevant legislation and our modern slavery strategy and commitments including setting expectations around procurement practices and training.

Risk assessment and supplier mapping

Mapping suppliers globally against key attributes including service type, geography and vulnerability to understand the risk that we are causing, contributing to, or directly linked to modern slavery through our operations and supply chains.

Due diligence

Providing the regions with approaches in supplier due diligence including contractual mechanisms, supplier questionnaire or declarations and audit approaches such as desktop, interview, deep dive or site visits.

Engagement and remediation

Developing proactive mechanisms to collaborate with our suppliers to develop their own best practice modern slavery risk mitigation and implementing grievance mechanisms and remedy.

GOVERNANCE

RISK AND ASSESSMENT

DUE DILIGENCE

ENGAGEMENT AND REMEDIATION

Our progress on our commitments

1. Governance – policy framework

Goodman's approach to modern slavery is aligned with a comprehensive set of global policies which reinforce our values and ethical expectations of our people and suppliers. Our policy framework is actively communicated and enforced and seeks to ensure that our people and suppliers understand our expectations and can recognise when to raise a concern.

Goodman's approach to modern slavery compliance and its practical effectiveness is aligned with several Goodman policies related to conduct and ethical behaviour that are relevant to modern slavery. During the FY20 reporting period, and as noted in our first modern slavery statement, our Corporate Governance Statement, Code of Conduct and Ethical Concerns Policy were reviewed to confirm they are aligned with our focus on modern slavery and human rights. In this reporting period, we also reviewed a number of policies for the same purpose. The following policies are the most relevant to human rights and modern slavery:



Policy – Operations	Purpose
Code of Conduct	Provides the ethical and legal framework for our people in conducting Goodman's business. The Code requires compliance with all legal and ethical requirements 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.
Workplace Bullying and Harassment Policy	Articulates our expectations in relation to the behaviour of our people and our commitment to providing a safe, respectful and inclusive workplace.
Diversity and Inclusion Policy	Goodman fosters a work culture of inclusivity and diversity and focuses on the wellbeing, health and safety of our people and our contractors. Goodman also drives programs to promote diverse and inclusive workplaces and support health and wellbeing including through flexible working arrangements and encourages learning, development and equal opportunities.
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 Policy ("Whistleblower" Policy)	An anonymous reporting channel for anyone (including whistleblowers) to raise concerns about human rights or modern slavery concerns.
Training and Communication Plan	Outlines the required training and communication for our people to promote our team members acting responsibly, ethically and in compliance with the law.

Policy – Supply Chain	Purpose
Statement of Business Ethics (Supplier Code of Conduct)	Communicates the expectations and minimum standards we place on our suppliers with regard to ESG risks and impacts, including complying with all applicable legislation in relation to labour practices and respecting and supporting human rights. Made available through our website and contractual engagements.
Procurement Policy	These principles and policies provide guidance and direction for Goodman's tendering and procurement practices globally and include Goodman's commitment to responsible supply chain management.
Sustainable Sourcing Framework	Goodman is implementing a Sustainable Sourcing Framework to set our expectations for all suppliers in relation to responsible sourcing and human rights and in addition detail our grievance procedures including assessment, investigation and remediation.
Ethical Concerns 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 in our operations and in our Global Safety Framework we set a minimum standard of safety that we require across our global operations.

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

2. Gender pay review

We continue to maintain robust internal processes and controls to comply with our legal and contractual obligations and to manage entitlements relating to our people. In FY21, Goodman undertook a gender pay review to identify any conscious or unconscious bias and to improve the integrity of outcomes with no significant issues identified.

3. Training and awareness

As noted in our first modern slavery statement, training and awareness are key controls to address the risk of modern slavery as our people are critical to identifying any modern slavery or human rights issues. Goodman sets clear expectations that Goodman team members should be alert to possible instances of modern slavery.

Goodman continues to educate our people, particularly those responsible involved in supply chain management and procurement to identify red flags of modern slavery and the actions required to respond appropriately including in relation to our whistleblowing mechanisms. Goodman has focused on providing practical training designed to

provide our people with the knowledge, tools and skills to:

- + Understand and describe what modern slavery is
- + Detail how to identify modern slavery in our supply chain
- + Recognise red flags
- + Understand our legal requirements and our actions being taken
- + Provide an overview of our internal reporting procedures and how workers can report concerns.

Goodman has continued to use the Greenlight Compliance training and communications program. As outlined in our first modern slavery statement, this consists of online modules and communications designed to assist team members to navigate Goodman's Code of Conduct and other key policies and reinforces the importance of acting ethically and in accordance with our values. As part of the program the online Compliance module Turning Grey Areas Green was assigned to our people globally in FY21 and included a scenario in relation to identifying instances of modern slavery and the whistleblowing mechanisms to raise any concerns.

CASE STUDY

Continental Europe training

Within our European business we have undertaken face to face training within each country with all team members. The training has been conducted for each of our country teams with high attendance rates. This training is mandatory and built into the onboarding process for our people and is incorporated as part of our overall ESG commitment and includes our business ethics and modern slavery content.

The training content includes team members' responsibility when procuring and also performing their day-to-day operations. The team was engaged to think of their role as eyes and ears on the ground as well as understanding the various legislation driving this initiative.

The training approach was conducted as an interactive workshop. Within these workshops the material centred around how to identify key signs that there may be some risk. In European countries it is common that considerable language barriers can prevent some of the messaging reaching the intended audience. For example, a migrant worker from Ukraine may not necessarily be able to read French. Therefore, team members are advised to look for signs of unusual behaviour such as same answers to questions from multiple ethnic groups, long working hours, transport to and from the workplace, limited access to phones and limited engagement to the wider workforce from migrant groups.



4. Due Diligence – a collaborative approach

Goodman has adopted a risk-based approach to modern slavery due diligence. Globally, we have focused on our tier 1 suppliers in our supply chains where we have a better level of influence. Our approach to responsible sourcing also includes the development of preferred panels of service providers who are screened against our responsible sourcing principles.

Strengthening supplier contracts

One of the key ways in which we articulate our human rights expectations and control the potential risk of modern slavery arising in our global supply chains is through our contracting process with our direct suppliers. In FY21, we updated our Global Statement of Business Ethics (Supplier Code of Conduct) to reflect the expectations of our people and our suppliers with respect to human rights and modern slavery. We expect our suppliers to communicate these requirements within their own operations and supply chain.

In parallel, we commenced a review of our procurement contracts to incorporate the Statement of Business Ethics and other relevant modern slavery clauses. In FY22, we will continue to review contracts to streamline modern slavery provisions in standard contracts to ensure consistency across the Group.

An extract of our Statement of Business Ethics

Human rights

- + *Respect human rights and take reasonable steps to identify and assess risks of modern slavery practices in your operations and supply chains*
- + *Take all reasonable action to address any modern slavery issues in your supply chain and work with Goodman to remedy any instances of modern slavery*
- + *Source services, materials and products from ethical suppliers who comply with all relevant legislation and seek to avoid child labour and modern slavery.*

Within our European business the Goodman Statement of Business Ethics has been translated into the six applicable languages (English, German, French, Dutch, Italian and Spanish) and each posted on the relevant country website.

Monitoring – supply chain

For moderate to high risk areas, an additional control mechanism we use is supplier self-assessment questionnaires or declarations to identify red flags.

Australia

In Australia, Goodman has continued to work with the Property Council of Australia, Informed 365 (the platform provider), other leading property companies and industry experts on the Ethical Sourcing Portal and supplier questionnaire. During FY21, Goodman re-issued the modern slavery questionnaire to its high-risk suppliers engaged by the Australian business including suppliers in construction, cleaning, security and landscaping industries. The completion rate was 75% and Goodman will continue to engage with suppliers that returned questionnaire responses warranting a closer look to ascertain whether there are appropriate controls are in place to mitigate modern slavery risks.

Our focus for FY21 was understanding the level of modern slavery maturity and awareness of our suppliers and identifying trends and any areas of elevated risk that require further engagement with our suppliers.

In terms of modern slavery maturity, the key factors we consider are that only 29% of our high risk suppliers are reportable entities and only 20% have completed a formal risk assessment of their own operations and supply chain. We consider that suppliers with greater visibility of their operations and supply chains are more likely to operate efficiently, have better working relationships, and be able to assess and address risks including modern slavery. We acknowledge that engagement with suppliers and education is an important part of our modern slavery program, particularly for smaller suppliers who do not have significant compliance resources. To this effect we leverage the educational resources from the Supply Chain Sustainability School to enhance supplier understanding and this will remain a focus in FY22.

Some of the other areas highlighted by our supplier assessment questionnaire that will guide our engagement with suppliers in FY22 are:

- + 62% use sub-contracting or third party recruitment agencies
- + 46% use direct recruitment but the remainder use agency or labour providers with only 1% monitoring labour providers for evidence of no recruitment fees
- + 50% procure goods overseas.

Cleaning contractor review – use of the supplier questionnaire

In February 2021, prior to conducting a cleaning tender, the Procurement team assessed all incumbent and potential cleaning contractors through the Ethical Sourcing Portal's questionnaire. Completion of the questionnaire was mandatory to be eligible for participation in the tender.

Regional response

Our regions were provided with an overview of Australia's due diligence approach and implementation of the supplier questionnaire. Goodman's regional businesses have made adaptations of this core material and follow the approach of a questionnaire and/or a supplier statement of declaration, as well as focusing on contractual mechanisms. In some regions, Goodman may also choose to undertake an audit of suppliers to monitor compliance, or in response to a potential breach of policy and standards.

Examples of due diligence within our regions undertaking include:

- + Europe created a questionnaire which will be issued to their 25 General Contractors
- + In Brazil, physical audits of contractors were conducted by an external third party
- + In China/Hong Kong, a supplier declaration will be issued to suppliers
- + In the US, a supplier questionnaire has been prepared to issue to suppliers
- + Japan completed a supplier questionnaire both in English and Japanese comprising key questions on modern slavery
- + UK completed their supplier categorisation and a desktop analysis on shortlisted suppliers which were deemed to be at higher risk (construction, office service and real estate services).

EDUCATION OF OUR SUPPLIERS IS IMPORTANT IN MITIGATING THE RISKS IN OUR SUPPLY CHAIN



Our next step for all regions is to engage with those suppliers that have indicated limited awareness and understanding of modern slavery. Engagement will occur through targeted awareness of our Statement of Business Ethics, supplier statement declarations, and questionnaires.

CASE STUDY

Deep dive into Greater China development suppliers

To assess the risk and to inform our due diligence processes an extensive deep dive review of higher risk construction suppliers was conducted. The review revealed the most significant risk from our tier 1 suppliers is the outsourcing of labour due to the potential exploitation and poor working conditions when the contracting process is one step removed.

To combat the risks in relation to modern slavery in the Greater China region, some of the mechanisms put in place include:

- + Ensuring supplier accreditation and that all workers are registered with the Construction Industry Council
- + Implementation of a Supply Chain Declaration as a condition of engagement as part of the tendering process
- + Contractual protections such as the Statement of Business Ethics (Supplier Code of Conduct) and placing the responsibility of the actions of subcontractors on the contractors themselves
- + Conducting on site investigations and monitoring the records of working hours to ensure that hours and working conditions are reasonable
- + Making our people aware of the modern slavery risks so they can be alert to any red flags.

Despite contractual protections and the monitoring of records there is still potential for issues to arise. We are committed to continuous review of our suppliers as part of our due diligence processes to actively identify and manage the risk of modern slavery practices.



CASE STUDY

Brazil

According to the Global Slavery Index for Brazil, in the period between 2003 and 2017 nearly 35,000 people were rescued from circumstances of modern slavery. Specific to our supply chain, the construction sector, due to accelerated urbanisation, has been identified as an area with increasing instances of modern slavery. As a result, our approach has been more direct and targeted.

We have implemented a comprehensive due diligence framework which is commensurate to the supplier risk profile. Our on-boarding process includes the following elements:

- + Information is requested from potential suppliers and the level of detail required determined by the supplier profile based on the types of services to be provided, potential interaction with public authorities and materiality of the services. A high-risk supplier must

provide assurances pertaining to labour, code of conduct and appropriate certifications. The registration is mandatory and must be concluded before execution of an agreement. The supplier questionnaire is renewed annually.

- + A review of the 'blacklist' provided by the Ministry of Labour for companies that have been prosecuted due to work conditions (which can cover a range of infractions including those that may be considered akin to modern slavery)
- + Contractual mechanisms in our arrangements with suppliers related to modern slavery
- + A third party consultant conducts a review of compliance by our General Contractors, and key service providers of the safety regulations on the site and worker accommodation near our sites.





5. Engagement

Goodman continues to be committed to working collaboratively to drive change that addresses the causes of modern slavery. Collaboration with our peers, engagement with investors, customers and regulators is encouraged to leverage possible influence and cultivate shared learning.

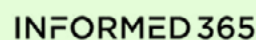
We have established extensive supply chain relationships across each of our operating regions. We appoint General Contractors for the delivery of our developments, who we partner with to deliver the quality outcomes we expect whilst also prioritising social, environmental and human rights factors. In FY22, we aim to engage more with our suppliers in respect to responsible sourcing and work with those who operate with similar values. Increasingly, we expect our procurement decisions to reward like-minded organisations.

Property Council of Australia (PCA) Modern Slavery Working Group

Goodman also seeks out partnerships where we can drive strategic initiatives and learn from others such as our involvement with the Property Council of Australia working group.

Goodman joined the PCA Modern Slavery Working Group to collaborate with other leading property companies in Australia to

better understand and remediate modern slavery risks associated with the property and construction sectors. Our objective is to identify opportunities for the industry to collectively strengthen controls. The group is supported by [Better Sydney](#) for subject matter expertise and project management, the [Supply Chain Sustainability School](#) for educational resources, and with [Informed365](#) providing the technical expertise around the platform itself.



WE ARE COMMITTED TO BETTER UNDERSTANDING THE RISKS OF MODERN SLAVERY IN OUR GLOBAL SUPPLY CHAIN

We also recognise the importance of engagement with specialist consultants, government and NGO's and this will remain a key consideration for FY22.

6. Remediation

We remain committed to providing access to remedies through effective grievance mechanisms and will provide for, or cooperate in, remediation where we identify that we have caused, contributed or are directly linked to modern slavery.

Grievance mechanisms

Grievance mechanisms – a mechanism accessible directly to individuals to raise a human rights concern, such as modern slavery, and lodge a complaint with a company or other entity to seek remedy.

During the reporting period, we continued to monitor the reports made via our grievance mechanisms made available to our people, contractors and external parties including suppliers and their workers to raise grievances about unethical or improper conduct such as potential instances of modern slavery or other human rights abuses. Our Ethical Concerns Policy is publicly available on our [website](#).

The reporting of instances of unethical or improper conduct from our supply chain partners or the general community are encouraged, and can be initiated via the Goodman website or emailed anonymously to ethicalconcerns@goodman.com.

Our people receive training on our Ethical Concerns Policy and were separately reminded of the importance of it during FY21. No concerns were received via our whistleblowing mechanisms in relation to any modern slavery or human rights issues in Goodman's operations or supply chains during FY21. Our supply chain is made aware of this policy through our Supplier Code of Conduct.

As part of our modern slavery actions in FY22, we are confirming our processes are trusted and accessible by external parties including vulnerable workers.

Remediation

Remediation is the process of remedying adverse human rights impacts, such as modern slavery, by seeking, to the extent possible, to restore the affected person/s to the position they were in before the impact occurred.

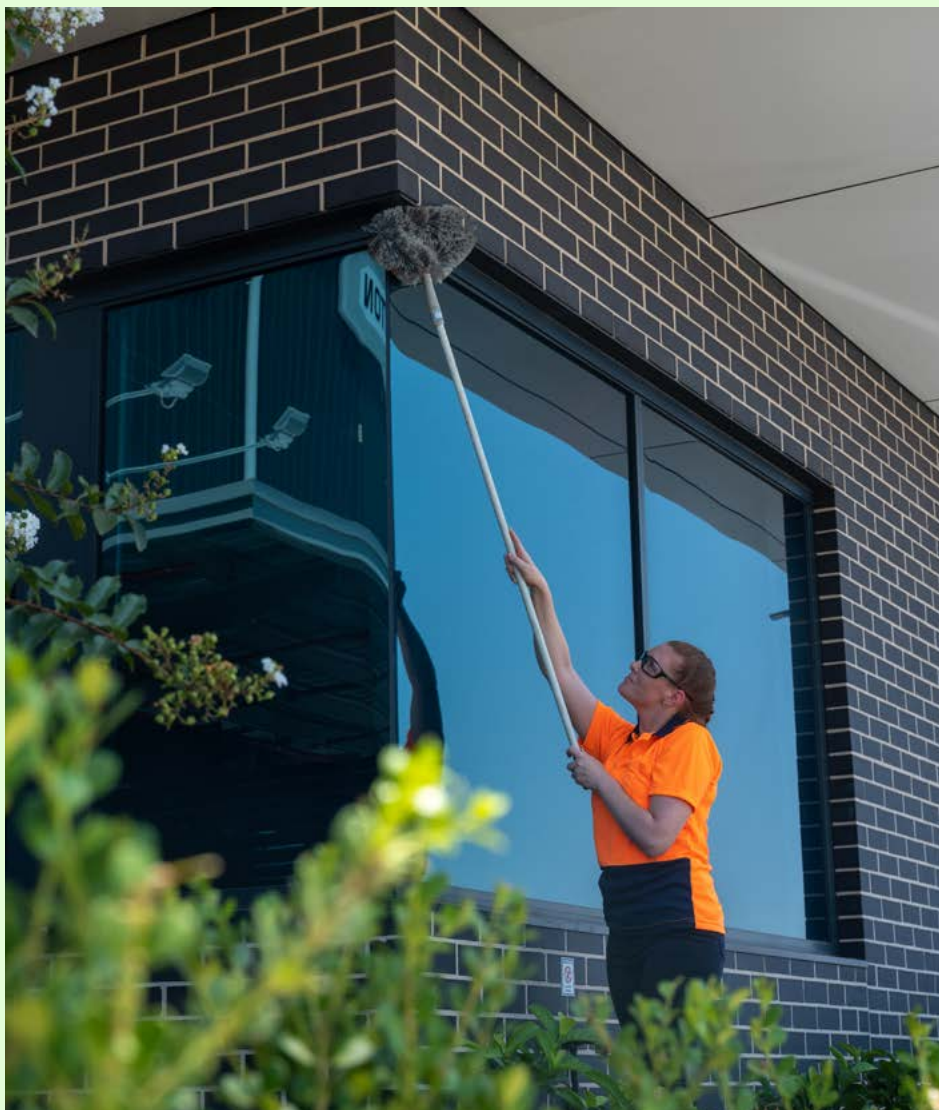
Remediation is an important component on our modern slavery program. Any concerns that are raised will be assessed and investigated and reported to the Risk and Compliance Committee and, if necessary, any significant concerns referred to our Goodman Group Boards. As part of our modern slavery program, we also have documented appropriate escalation mechanisms if cases of modern slavery are uncovered and documented a high-level flow chart indicating the processes to be undertaken in the event an instance of modern slavery in our operations or supply chains was identified. Some of the key elements of this are:

- + Responding to the identification of instances or suspected instances of modern slavery in a manner that ensures the safety and privacy of the victim and seeking their input into any remediation action plans. This will be different on a case by case basis. We will seek to work with regulatory authorities and expert advisors such as local NGOs as and when appropriate.
- + Having a trusted, confidential grievance mechanism (and ensuring our suppliers have one), to elevate and address worker concerns, and to act as an early warning system for modern slavery risks.

Regarding our suppliers, we set clear expectations in our Supplier Code of Conduct that they should be alert to modern slavery risk and work to prevent and address it. We also encourage our suppliers to be open and honest about the challenges they face. We know that adopting high standards is not enough. Goodman recognises that working with our suppliers to develop their capability to identify and respond to responsible sourcing challenges is important and this will be a continued focus in FY22.

We acknowledge that guidance on modern slavery remediation is still under development in Australia and globally. Through our engagement with the PCA modern slavery working group and subject matter experts, we will continue to monitor how best practice on remediation develops, and continually refine our approach. Our preferred approach is to positively influence outcomes and behaviours of suppliers. We will look to work with like-minded organisations, and the Property Council of Australia on how best to address remediation concerns. Where instances of modern slavery arise, we will reach out to specialist organisations for guidance and external advice.

In FY22, our Sustainable Sourcing Framework will be further reviewed to enhance our remediation approaches. In the interim our policy documents and contractual mechanisms reflect working together with suppliers to develop a positive outcome.



CASE STUDY

Australia Sine Pro Contractor Sign in App

Effective grievance processes and remediation are important elements of our modern slavery program.

In Australia, Goodman uses a wide range of contractors to develop and manage our properties, including in the construction, cleaning, security, and landscaping industries.

Recognising the risks to migrant and low-skilled workers in the provision of services to our properties, in FY21 we introduced a modern slavery alert to our contractor induction app, Sine Pro. All contractors and subcontractors must use the Sine Pro app each time they visit a Goodman property, including construction sites.

When signing in using the app, the contractor sees the alert setting out a list examples of what victims of modern slavery may experience. It also provides contact details for emergency services, the Australia Federal Police and non-government organisations who can provide support, confidential advice and translation services.



Assessing the effectiveness of our actions to assess and address modern slavery risks

Goodman uses key metrics to assess the effectiveness of our actions to identify and address modern slavery practices in our operations and supply chain. Our modern slavery working group continuously reviews and assesses the effectiveness of our processes to address modern slavery risks that our business causes, contributes to, or is directly linked to and reports our progress to the Risk and Compliance Committee and Goodman Group Boards. Our progress against the goals for FY21 are set out below:

Modern slavery commitments		AU	UK	NZ	HK / GTR CN	JP	US	BR	CE
Risk assessment	Supply chain mapping and identifying high risk suppliers in our global operations and supply chains	✓	✓	✓	✓	✓	✓	✓	✓
Training and awareness	Increasing awareness and understanding of modern and human rights risks for our people	🕒	🕒	✓	🕒	🕒	✓	✓	✓
Due diligence	Policies, contracts and monitoring with supplier questionnaires, declarations, deep dives, audits or site visits	✓	🕒	🕒	✓	✓	✓	✓	✓
Engagement	Process to engage with suppliers and workers regularly and transparently	✓	🕒	>>	🕒	🕒	>>	✓	🕒
Remediation	Promoting grievance mechanisms, providing remedy and taking corrective actions	🕒	🕒	🕒	🕒	🕒	🕒	🕒	🕒

✓ Completed

🕒 Work in progress

>> Focus for the coming year

Our KPIs we are introducing across our four key performance areas to assess effectiveness are detailed below:

Key performance area <i>What we are assessing</i>	Action <i>What are we doing</i>	Measurement <i>Our KPI's</i>
Governance and risk management	<ul style="list-style-type: none"> + Goodman Group Boards and Risk and Compliance Committee oversight + Policy review + Streamline approach and processes across the Group + External collaboration on key risks. 	<ul style="list-style-type: none"> + Provide updates to the Risk and Compliance Committee at least quarterly + Biennial review of key policies to ensure that modern slavery considerations are properly taken into account + Maturity assessments or audit of processes conducted + Consider the risks identified in our strategy to address modern slavery.
Due diligence and engagement	<ul style="list-style-type: none"> + Supplier self-assessment questionnaire, declaration or review (including desktop, interview or deep dive) + Review of supplier responses. + Contracts with modern slavery provisions 	<ul style="list-style-type: none"> + Seek to improve the completion rate of questionnaires or declarations year on year + Seek to utilise the educational resources from the Supply Chain. Sustainability School to enhance supplier understanding + Review the responses provided by suppliers and identify those that require further due diligence + Conduct reviews of higher risk suppliers (including desktop, interview, deep dive or site visits) + Goodman precedent documents reviewed for modern slavery or responsible sourcing commitments.
Training and awareness	<ul style="list-style-type: none"> + Team member and supplier training on modern slavery and associated risks. 	<ul style="list-style-type: none"> + > 90% of relevant global team members trained + Seek feedback from our people on the training provided and increase in awareness of modern slavery issues after training.
Grievance mechanisms and reporting	<ul style="list-style-type: none"> + Review of channels and mechanisms for grievances to be raised + Modern slavery issues identified and remedied. 	<ul style="list-style-type: none"> + Continue to monitor complaints received via reporting channels relating to modern slavery instances or suspected cases.

Goodman acknowledges that tackling modern slavery requires an ongoing commitment, effective engagement with our suppliers and collaboration with both the industry and NGO's. Over subsequent reporting periods we will continue to review and enhance our metrics and develop further metrics as required to assess the effectiveness of our actions, in line with continuous improvement.



Process of consultation

This Statement was prepared by our modern slavery working group which includes representatives globally from the business units of Procurement, Legal, Compliance, Risk and Sustainability. In the process of preparing this Statement, the modern slavery working group, the Risk and Compliance Committee and Goodman Group Boards have reviewed and provided feedback on its content.

The reporting entities actively engaged and consulted with all companies we own or control in the development of this Statement. Discussions were held with each region about the details of the reporting requirements and information regarding the actions we intend to take to address these requirements. The regions were also provided with relevant materials and updates during the reporting year.

Looking forward

Goodman is committed to identifying and remedying modern slavery risks in our supply chains and operations. We are committed to the below actions in the year ahead.

Operations commitments

- + Continue to progress our global commitments which remain relevant and important objectives
- + Measuring and reporting progress across our global commitments and reviewing our metrics
- + Developing a global bespoke modern slavery online training module for our people prioritising those managing higher risk categories.

Supply chain commitments

- + Statements and policies related to modern slavery embedded in procurement processes
- + Supplier onboarding to include awareness training related to modern slavery
- + Greater engagement with suppliers on modern slavery issues and assessing screening and qualification procedures
- + Confirming that our grievance mechanisms are trusted and accessible by external parties including vulnerable workers.