

*Creating extraordinary places, connecting  
and enriching communities*

# SCENTRE GROUP

## 2020 Modern Slavery Statement



## About this statement

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Scentre Group's 2020 Modern Slavery Statement sets out the actions taken by the Group to identify, assess and address the risks of modern slavery occurring in its direct operations and supply chain, including for the purposes of meeting the mandatory reporting criteria set out in section 16 of the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act), for the period 1 January – 31 December 2020.

The statement is prepared by Scentre Group Limited on behalf of the entities in Scentre Group (ASX: SCG) (the Group). The Group is a stapled group comprising Scentre Group Limited, Scentre Group Trust 1 (SGT1), Scentre Group Trust 2 (SGT2) and Scentre Group Trust 3 (SGT3), and their controlled and managed entities. The Boards of Scentre Group Limited, Scentre Management Limited (as responsible entity of Scentre Group Trust 1), RE1 Limited (as responsible entity of Scentre Group Trust 2) and RE2 Limited (as responsible entity of Scentre Group Trust 3) are identical.

Scentre Management Limited is also the responsible entity of Carindale Property Trust, a listed managed investment scheme (ASX:CDP).

More information about the Group can be found in the Scentre Group 2020 Annual Report available in the investor section on our [website](#).

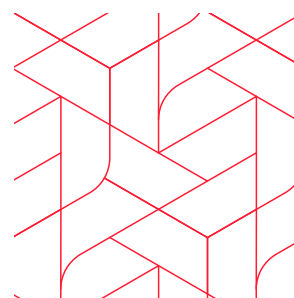
The Group has a common set of governance policies and procedures and a common risk management framework which are described in sections 4 and 5 of this statement. The entities and operational divisions which comprise the Group were consulted with as part of this process.

**This Statement was approved by the Board of each of Scentre Group Limited, Scentre Management Limited (as responsible entity of Scentre Group Trust 1), RE1 Limited (as responsible entity of Scentre Group Trust 2) and RE2 Limited (as responsible entity of Scentre Group Trust 3) on 29 March 2021.**

# Contents

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|          |   |    |
|----------|---|----|
| <b>1</b> | Message from our Chief Executive Officer _____                                  | 04 |
| <b>2</b> | About Scentre Group _____   | 06 |
| <b>3</b> | What we achieved in 2020 _____  | 08 |
| <b>4</b> | Our approach to governance _____  | 10 |
| <b>5</b> | Our approach to risk management in our direct operations and supply chain _____ | 13 |
| <b>6</b> | Our supply chain engagement _____   | 15 |
| <b>7</b> | Our 2021 roadmap _____  | 19 |



# 1. Message from our Chief Executive Officer

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## Dear Stakeholders,

We are committed to developing and operating our portfolio of 42 Westfield Living Centres across Australia and New Zealand in a way that respects the dignity, wellbeing and human rights of our employees, contractors and the communities in which we operate. This includes a commitment to addressing the risk of modern slavery in our supply chain. These commitments align to Our Purpose – *creating extraordinary places, connecting and enriching communities* – as well as our objective to operate as a responsible, sustainable business. It is consistent with our corporate governance practices, our DNA (or values) and our business integrity framework which is found in our Code of Conduct (the Code). All of our people must comply with the Code and recommit to it every year so that our high standards of ethical business practices are embedded and sustained.

This is our first Modern Slavery Statement. It outlines the actions we have taken to identify, assess and address the risks of modern slavery occurring in our operations and supply chain to meet the mandatory reporting criteria set out in section 16 of the Modern Slavery Act. This statement has been prepared by our Modern Slavery Action Group and approved by the Scentre Group Board.

Scentre Group is a vertically integrated business which means we have the internal capability to develop, design, construct, operate, manage and market our Living Centres. The majority of our supply chain is in Australia and New Zealand, reflecting our markets of operation. You can read more about the breakdown of major supplier categories on page 7 of this statement.

Each year, we continue to enhance and improve our disclosures and reporting as part of our commitment to operating as a responsible, sustainable business.

During 2020, we undertook a range of activities to assess our modern slavery risk, assess our effectiveness in these areas and determine our future priorities.

Some of the key highlights from our work in 2020 include:

- establishing relevant and practical governance frameworks to inform our work, including a Modern Slavery Action Group with representation from all relevant areas of our business
- the development of a Modern Slavery roadmap to prioritise key actions to inform our risk assessment and analysis
- analysis to identify suppliers at a greater risk of having modern slavery in their supply chain
- establishment of a supplier analytics database to help our people identify high risk suppliers and survey these suppliers to understand how they address modern slavery risk in their operations and supply chains
- amending the terms of our procurement processes and standard form contracts requiring suppliers to comply with our Supplier Code of Conduct and to have a system in place to identify, assess and address the risk of modern slavery in their business
- delivering Modern Slavery Training to identified key personnel
- participation in the Property Council of Australia's Informed 365 platform, which includes a supplier self-assessment questionnaire as well as the ability to provide education and training for suppliers about modern slavery.

In 2021 our areas of focus are:

- enhancing our education and training opportunities for both our people and suppliers
- enhancing our approach to supplier due diligence where risks are identified
- expanding our risk assessment approach with our suppliers including embedding our risk and assurance process into the onboarding of new suppliers.

We look forward to continuing to learn and progress our roadmap action plans and play our part in reducing risk in our supply chain, helping to eradicate modern slavery from global supply chains.



**Peter Allen**

Chief Executive Officer

31 March 2021

## 2. About Scentre Group

Scentre Group owns and operates an extraordinary platform of 42 Westfield Living Centres across Australia and New Zealand. The Group’s retail real estate assets under management are valued at over \$49.9 billion and shopping centre ownership interests are valued at \$34.1 billion<sup>1</sup>. Approximately 20 million people live within close proximity to a Westfield Living Centre and the portfolio has a strong franchise value and ability to attract the world’s leading retail brands.

We are local to our customers and located in the heart of their communities. We had more than 450 million customer visits across our 42 Westfield Living Centres in 2020, with an average of 46 million per month in the fourth quarter.

The Group invests in its assets through redevelopment opportunities, ensuring our Living Centres meet the changing needs of our customers. Many centres in the portfolio are owned in partnership with leading property investment institutions.

### 2.1 Our Purpose, Our Plan and our DNA

*Our Purpose – creating extraordinary places, connecting and enriching communities* – informs our culture and strategy.

*Our Plan – to create the places more people choose to come, more often, for longer* – is based on the principle that we compete for the time and attention of our customers. It reinforces the competitive advantage we have in the location of our Westfield Living Centres. Our ability to understand what our customers want drives demand and high visitation and creates more opportunities for our retail partners to connect with more customers.

In striving to achieve Our Purpose and deliver Our Plan, we are guided by our values – our DNA – which underpin the standards we expect of ourselves and of others.

Our DNA is a central part of our approach to business integrity and our Code of Conduct. It is how we put our culture into action. Our DNA is expressed as:

- We put our customer first
- We act with integrity
- We strive for excellence
- We succeed together
- We are constantly curious
- We create a positive legacy



<sup>1</sup>As at 31 December 2020

## 2.2 Our operations

Scentre Group is a vertically integrated business which means we have the internal capability to develop, design, construct, operate, manage and market our Westfield Living Centre portfolio.

The Group’s direct operations are located in Australia and New Zealand, with approximately 2,427 employees as at 31 December 2020. Our employees are primarily in professional or managerial roles on a permanent basis and have their eligibility to work confirmed by us as part of our recruitment and onboarding process. Our employees are employed on an award and non-award basis. For those employees under an award they are primarily covered by the General Retail Industry Award and Clerks Private Sector Award, and are paid in accordance with them. In 2020 we undertook a review of the entitlements paid to employees earning less than \$80,000 to ensure that they were paid correctly. The review identified no material or systematic issues.

We have a suite of employment policies and processes which reflect best practice, including anti-bullying and anti-sexual harassment policies; work health and safety policies and procedures; personal, compassionate and parental leave policies as well as a Whistleblower Protection Policy. This is supported by our learning and development program which educates our people about key workplace policies including our Code of Conduct.

The Group is organised by teams reflecting our vertically integrated business. These include Customer Experience, Design and Construction, Development and Strategic Asset Management and Leasing & Retail Solutions, along with support functions including Analytics, Finance, Human Resources, Technology, Treasury, Risk, Audit, Security, Legal, Compliance and Company Secretariat and Corporate Affairs. Most of our employees work in managing our Westfield Living Centres and most of our construction staff are predominantly involved in the project management of sub-contractors.

Because of this, we consider that the risk of modern slavery occurring in our direct operations is low.

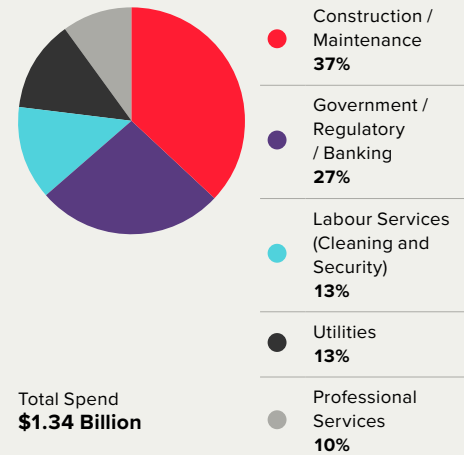
## 2.3 Our suppliers and supply chain

A breadth of organisations and industry sectors are included in our supply chain. These organisations are predominantly located in Australia and New Zealand, with over 98 per cent of our total supplier spend in 2020 being paid to suppliers in these countries.

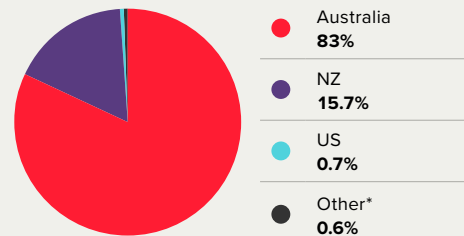
Most of our expenditure relates to the operation of our Westfield Living Centres, particularly cleaning and security services and maintenance.

Our expenditure with suppliers in the development, design and construction categories is cyclical and depends on our development program. In 2020, our construction activities were predominantly in Australia. We completed a new dining precinct at Westfield Doncaster (Victoria), a \$50 million project at Westfield Carindale (Queensland) including the introduction of a new Kmart store as well as special projects at Westfield Belconnen (ACT) and Westfield Hornsby (NSW). In December 2020, Scentre Group was appointed by Cbus Property to design and construct the residential and commercial tower on the site of the former David Jones menswear store on the corner of Market and Castlereagh streets in Sydney’s CBD.

### Top 5 Categories of spend:

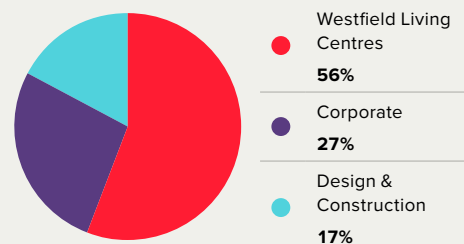


### Location – Tier 1 Suppliers:



\*Europe, Philippines, Singapore, China, Central America, Israel

### 2020 Spend by Operational Area:



## 3. What we achieved in 2020

### 3.1 Our 2020 actions

In 2020, we worked to embed the approach led by our Modern Slavery Action Group across relevant areas of our business, including in our risk, procurement and contract management processes.



#### Education and training

- Launched our online modern slavery training to our procurement staff and senior managers who are involved in making decisions which may be impacted by the risk of modern slavery to raise awareness and educate them on the Group's approach to the risk of modern slavery.
- Provided training sessions by subject matter experts for senior leaders.



#### Supplier engagement and due diligence

- Communicated our approach and expectations to our suppliers, through our Supplier Code of Conduct.
- Enhanced our Living Centre supplier prequalification and onboarding process to better understand our suppliers, their operations and their supply chains.
- Surveyed identified high risk suppliers to more comprehensively risk assess their operations and supply chain.



#### Risk and assurance processes

- Enhanced our Living Centre procurement, contracting and contract management processes to specifically address the risk of modern slavery.
- Implemented a Modern Slavery Response Framework to guide our response to actual or suspected incidents of modern slavery.
- Partnered with the Property Council of Australia's Informed 365 platform to assist with risk review and supplier education.





### 3.2 Working with our suppliers to respond to COVID-19

Our Westfield Living Centres are essential social infrastructure for the communities in which we operate.

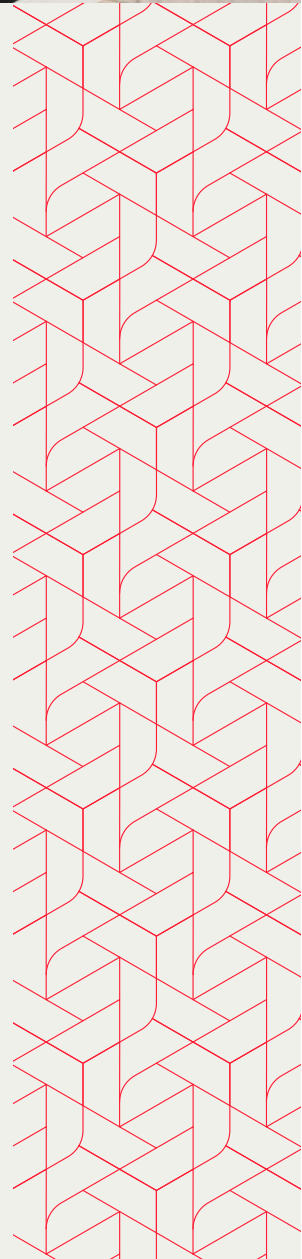
We took early and decisive action to manage our business through the disruption of 2020, taking steps to balance the health, safety and wellbeing of our customers, retail partners, people and suppliers with business continuity.

We engaged with our suppliers to understand the impact of COVID-19 on their businesses and to understand their COVID-Safe plans. We put in place processes to maintain the health and safety of their teams while they helped keep our Living Centres open to fulfil their essential role in the community. Where cleaning team members needed flexibility to help them manage the impact on their family responsibilities, we supported this. We continue to work with our suppliers to identify, assess and address any areas of concern.

Our centres remained open throughout 2020 and we worked closely with our suppliers to manage critical supplies, maintain our open times and support our team's wellbeing. This included the sourcing of personal protective equipment (PPE) and hand sanitiser for our frontline teams. During this period, we increased the frequency of regular toolbox talks to help our cleaning team members feel safe working at our centres, to understand the latest government health guidelines and how this may impact on their roles and responsibilities. We installed hand sanitiser dispensers and, despite shortages, equitably sourced over 2,000 litres per week to make it available at entrances, lift lobbies, amenities, valet, directories and at concierge desks across our Westfield Living Centre portfolio.

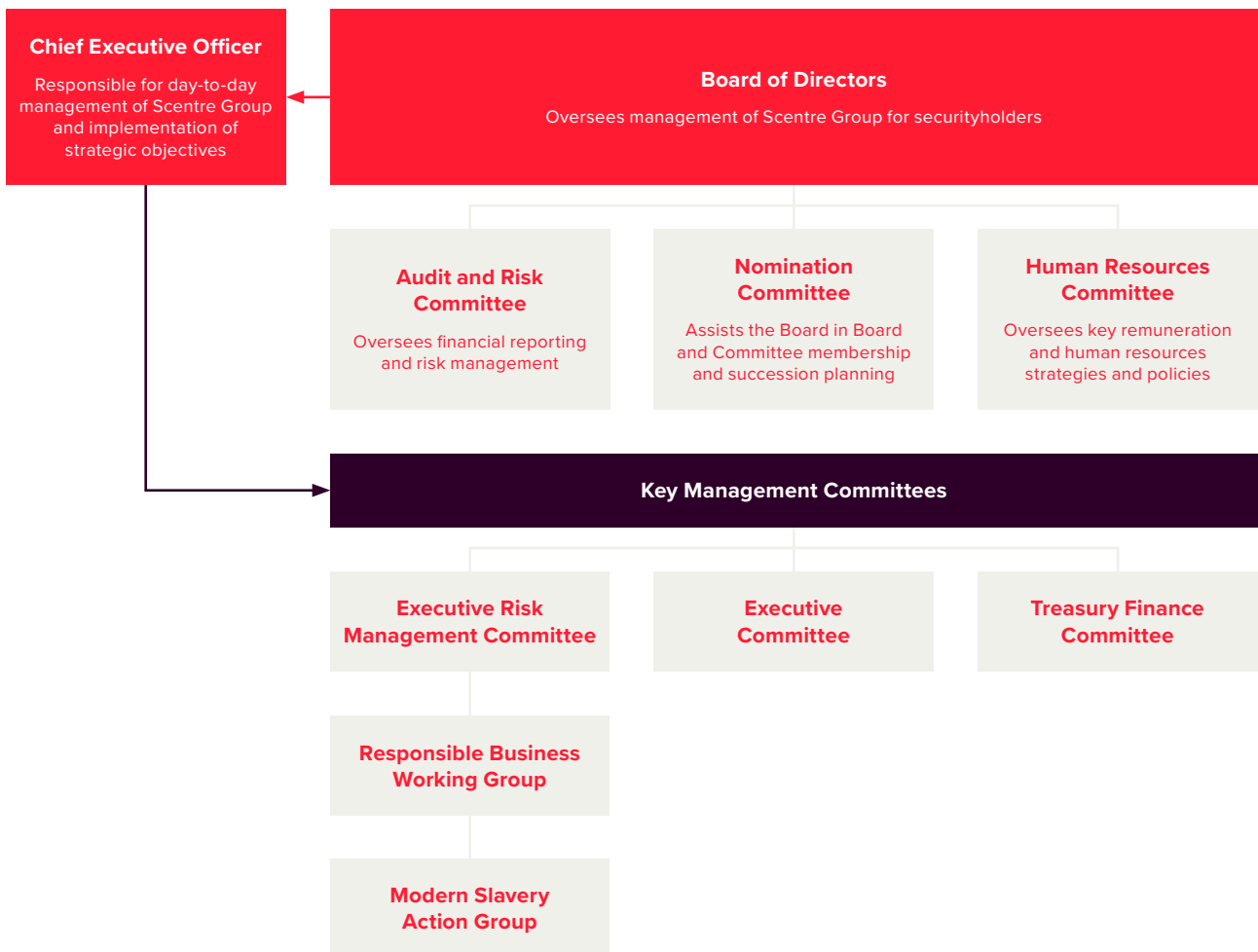
Our cleaning suppliers were a key part of our response to the changes in our operating environment. As state and federal government restrictions changed, we worked with our cleaning suppliers to adjust resources to suit each centre's needs. Their agility meant rosters could be changed from after hours cleaning to cleaning during trading hours, and with food court closures we were able to redeploy cleaning teams to increase the cleaning of high-touch points throughout each centre.

Weekly meetings to review operational requirements, which still continue, allow site managers to provide feedback and adapt our engagement with our suppliers where necessary, including staffing numbers, PPE requirements, all cleaning consumables and the wellbeing of team members.



## 4. Our approach to governance

Our governance practices are fundamental to the way we work as a responsible, sustainable business.



## 4.1 Our governance framework

At Scentre Group governance, ethical business practices and high standards of personal conduct are fundamental to the way we work as a responsible, sustainable business. Our governance framework supports our business in delivering our Purpose – *creating extraordinary places, connecting and enriching communities* – and implements appropriate oversight and accountabilities to achieve our commitment to be a responsible, sustainable business.

Our responsible business governance framework involves an integrated, cross-functional approach. This includes leaders of relevant functions making up our key management committees, the Executive Committee and the Executive Risk Management Committee.

The Board is assisted in its oversight of risk by the Audit and Risk Committee, supported by the Executive Risk Management Committee, the Executive Committee and a dedicated Risk function. The Group's enterprise risk management policy and framework provides the business guidance as to how Scentre Group identifies, assesses, monitors and manages material business risks including the risk of modern slavery in our direct operations and supply chain. The policy and framework are integrated in our day-to-day business processes.

In 2019 we established a cross-functional Modern Slavery Action Group to oversee our assessment, review and management of the risks of modern slavery occurring in our direct operations and supply chain, and to define the Group's roadmap of actions to address the risk of modern slavery. Representatives of key business areas form part of this group, which reflects our cross-functional approach, and they were consulted and informed the Group's approach.

Our Modern Slavery Action Group was guided by our Responsible Business Working Group, which in turn reports to the Executive Risk Management Committee. The Responsible Business Working Group oversaw the development, implementation and ongoing management of responsible business strategies and frameworks so that Scentre Group remains a responsible, sustainable business.

## 4.2 Our policies and practices

Fundamental to the way we work as a responsible, sustainable business is our commitment to ensuring our business practices reflect a high standard of corporate governance and accountability.

Our **Code of Conduct** sets out the standards we require of everyone who works for Scentre Group and requires our people to treat everyone they deal with fairly, courteously and with respect, and to comply with all applicable laws and regulations.

Our **Human Rights Policy** sets out Scentre Group's commitment to managing our business and operations in a way that respects the dignity, wellbeing and human rights of our people, contractors and communities in which we operate. This includes our commitment to playing our part in eradicating modern slavery.

Our **Supplier Code of Conduct** is the tool through which we encourage and, where appropriate, mandate requirements to help us and our suppliers to conduct business in a safe, accountable and equitable manner. Our suppliers are required to observe this code in delivering products or services to us. For example, our suppliers are expected to ensure there are no instances of modern slavery in their operations and supply chain and comply with all applicable laws and regulations relating to modern slavery as well as human rights, employment conditions, working hours, wages, benefits and entitlements. We have incorporated an obligation to comply with our Supplier Code of Conduct in our standard form contracts and key high risk supplier agreements

Our **Anti-Fraud, Bribery and Corruption Policy** sets out Scentre Group's commitment to high standards of ethical conduct and to promoting and supporting a culture of ethical behaviour and good corporate governance. It forms part of our risk management framework and supports our Code of Conduct and our Whistleblower Protection Policy. The policy requires appropriate checks be made when selecting and engaging new business partners, and that business partners must not be engaged, or business conducted with them, if there is a material risk they will violate Scentre Group's codes or policies.

Our **Whistleblower Protection Policy** encourages reporting of instances of unethical, unlawful or improper conduct and assists in identifying behaviour which is inconsistent with our values, culture or policies. It is available for our suppliers and their employees, as well as Scentre Group directors, officers and employees. In addition to our Whistleblower Protection Officers, we have implemented Scentre Whistleblower a secure online portal powered by Whispli, an external provider to the Group, which enables reports to be made confidentially, anonymously and outside of business hours.

More information about our approach to governance can be found in the [Scentre Group 2020 Corporate Governance Statement](#).

Our Whistleblower Protection Policy is publicly available and has been promoted to our people, as well as our on-site suppliers and their staff.

### 4.3 Our people

Our people are a key part of our approach to managing the risk of modern slavery in our supply chain. We educate them about modern slavery, Scentre Group's commitment to eradicating modern slavery and how we will manage the risk of modern slavery in our supply chain.

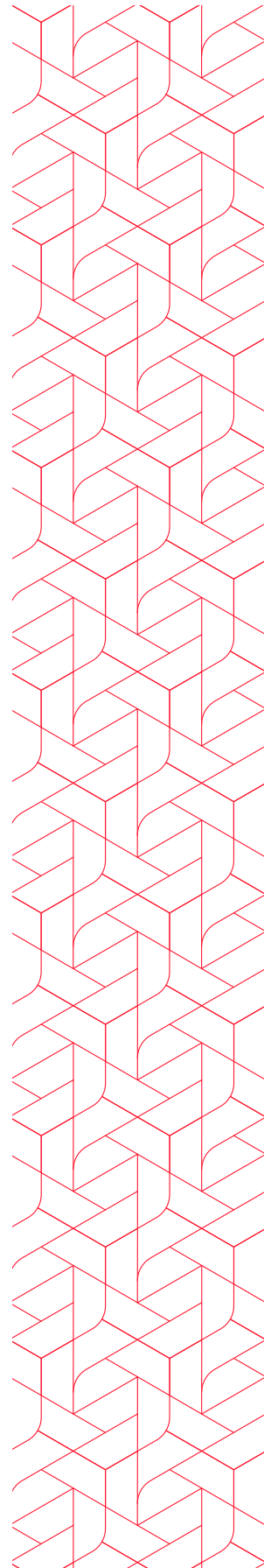
We achieve this through our learning and development programs, our approach to knowledge sharing and cross-functional integration for projects, and the tools we make available to our people to perform their roles.

As part of this approach we have provided online training on the risk of modern slavery to our procurement staff and senior managers who are involved in making decisions which may be impacted by the risk of modern slavery.

All of our people must comply with our Code of Conduct, which sets out our expectation that our people treat everyone they deal with fairly, courteously and with respect, and requires them to comply with all applicable laws and regulations. Everyone is required to review and recommit to the Code each year.

Everyone is expected to play their role in creating workplaces that keep us all safe. We bring this to life through our culture of People Protecting People.

Our people have also been made aware of our Human Rights Policy, Supplier Code of Conduct, Anti-Fraud, Bribery and Corruption Policy and Whistleblower Protection Policy.



## 5. Our approach to risk management in our direct operations and supply chain

### 5.1 Our risk management process

At the core of our approach to risk management is the establishment of a strong risk culture, where behavioural expectations are set by the Board and Executive Committee and actively promoted and role-modelled throughout our business.

Our enterprise risk management policy and framework is integrated into our day-to-day business processes. Risk management accountability is a key requirement for our business managers and leaders.

We take a risk-based approach to considering and managing the risk of modern slavery in our direct operations and supply chain, consistent with our overall approach to risk management. As part of that approach, key operational, supplier and supply chain risks are progressively being captured in team risk registers where relevant, along with the causes, controls and treatment plans for those risks. Risk registers are reviewed every six months as part of our risk management processes.

Scentre Group's direct operations take place in Australia and New Zealand where all of our Westfield Living Centres are located, with our support offices located in Sydney, Australia and Auckland, New Zealand. The risk of modern slavery occurring in our direct operations is low given the demographic and regulatory environment in which we operate, as outlined in section 2.2.

Our direct operations are supported by our supply chain, with many of our core operational activities such as cleaning and security subcontracted to third parties. Our risk reviews highlight our design and construction, facilities management and technology areas as having the potential for there to be a greater risk of modern slavery in our supply chain. How we work with our suppliers to understand this risk, and the processes we have in place for managing our relationships with our suppliers, are described in section 6.

### 5.2 Our approach to remediation

As we assess and address modern slavery risks within our direct operations and supply chain, situations that foster modern slavery or suspected situations of modern slavery may be identified. Our Modern Slavery Response Framework guides our people to respond to actual or suspected incidents of modern slavery, or a change in circumstances which may result in a materially increased risk of modern slavery occurring.

The framework aims to protect the health and safety of workers in both our direct operations and supply chain. This is done by educating our people and our suppliers on modern slavery risk and appropriate means to respond and remediate, if appropriate.

Our approach to achieving these objectives is guided by the principles of:

- **Safeguarding victims** - victims of modern slavery are often very vulnerable people. We recognise that our response must acknowledge that vulnerability, take appropriate steps to protect victims and not unnecessarily further disadvantage them through the remediation actions taken.
- **Respecting confidentiality** - where a potential incidence of modern slavery is identified, confidentiality should be maintained if possible, in light of the need to safeguard the victim and ensure allegations can be properly investigated.

More information on our approach to risk management and assessment can be found in the Risk section of the Directors' report included in the [Scentre Group 2020 Annual Financial Report](#).



- **Gathering and securing information** - if there is a concern about modern slavery in our operations and supply chain, relevant information will be obtained and retained in order for the concern to be properly investigated. Consideration will be given to whether it is appropriate to use any contractual rights, including audit rights, to obtain this information.
- **Engaging with appropriate experts and authorities** – we recognise that Scentre Group may not always be best placed to directly respond to incidents of modern slavery in our operations or supply chain. Depending on the circumstances of modern slavery occurring, it may be appropriate to refer concerns to law enforcement or other authorities, or to work with non-governmental bodies for guidance to our response and if appropriate remediation process.

We recognise that actions taken to address modern slavery risks need to be in the best interests of the potential victims or victims and our response needs to be tailored to each individual situation. Response options considered include:

- Developing and implementing an action plan to address risk factors or issues identified and monitoring the status of action plans to closure. This may be in consultation with our suppliers, relevant authorities or other experts and may include supplier education and direct support or compensation for victims.
- Requesting suppliers obtain third-party certification or a third-party audit to understand the full extent of any issues and confirm a remediation plan is in place and tracked to closure.

### 5.3 Assessing effectiveness

We consider the effectiveness of our actions to address the risk of modern slavery as part of our overall governance and risk management framework.

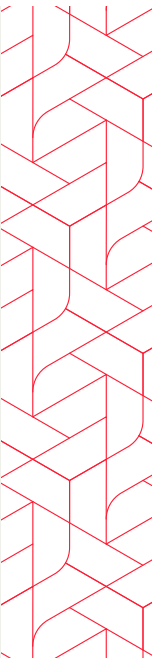
Key deliverables are reported to the Responsible Business Working Group and the Executive Risk Management Committee the roles of which include monitoring and oversight.

Scentre Group also has a risk based Business Review and Audit (internal audit) program which independently assesses the design and operating effectiveness of the Group's key controls to manage key risks. Results of any audits are reported to the Executive Risk Management Committee and the Audit and Risk Committee on a semi-annual basis. Modern slavery risks and controls will be considered as part of this program in 2022.

Scentre Group recognises the value of engaging with industry leaders and other partners to assist us to identify, assess and manage the risk of modern slavery in our operations and supply chain.

We participate in the Property Council of Australia's Informed 365 platform, which includes a supplier self-assessment questionnaire as well as education and training for suppliers about modern slavery.

We use a pre-qualification platform called Cm3 to conduct risk assessments of a large number of our suppliers. Cm3 pre-qualifies companies by working directly with them to understand how they meet safety risk management standards and ensure ongoing compliance. This helps us take a risk-based approach to identifying those suppliers at a higher risk of modern slavery occurring in their operations and supply chains.



## 6. Our supply chain engagement

We are committed to high standards of ethical conduct and to promoting and supporting a culture of ethical behaviour and good corporate governance. This commitment extends to our approach to engaging with our supply chain.

Our Supplier Code of Conduct sets out our expectation that our suppliers will ensure there are no instances of modern slavery in their operations and supply chains and will comply with all applicable laws and regulations relating to modern slavery. In 2020 we wrote to all of our suppliers to draw their attention to our Supplier Code of Conduct and our expectation that suppliers observe this code in delivering products or services to us.

### 6.1 Identified high risk suppliers

In 2019 and 2020 our Risk team worked with key business units along with our National Procurement Team to identify specific suppliers where modern slavery risk is potentially higher. These risk assessments were based on the supplier's sector and industry, product or service being provided, their physical location and their entity type.

Suppliers we identified as having a potentially higher risk for incidents of modern slavery were surveyed to more comprehensively risk assess their operations and supply chains and to understand what processes they have in place to address the risk of modern slavery. An identified higher risk area was labour hire services, including cleaning and security.

Examples of risk indicators initially identified across these suppliers included:

- the use of foreign workers or temporary or unskilled labour
- the sourcing of construction materials, plant and equipment and parts (e.g. stone, glass, structural steel, HVAC, Electrical and Vertical Transport) from countries outside Australia and New Zealand
- the sourcing of technology and technology components from countries outside Australia and New Zealand including connected screen and parking technology
- software development, software service support and telecommunications providers with labour located in countries outside Australia and New Zealand
- the procurement of uniforms and other goods potentially manufactured using cotton in countries outside of Australia and New Zealand.

### 6.2 Onboarding and prequalification

In addition to our identified high risk suppliers, suppliers who are pre-qualified using Cm3 also complete a modern slavery self-assessment questionnaire as part of our on-boarding and prequalification process.

In 2021 Scentre Group will review the results of these self-assessments, to identify any additional areas of high risk, the level of supplier understanding and engagement about the risk of modern slavery, and use this review to inform our approach for further supplier engagement.

## 6.3 Contracting and contract management

In 2020 we updated terms in our procurement processes and standard form contracts which require our suppliers to comply with our Supplier Code of Conduct and to have a system in place to identify, assess and address the risk of modern slavery in their direct operations and supply chain.

As part of our tendering processes for cleaning and security, which we consider labour hire services that are higher risk for modern slavery, we also:

- benchmark and assess pricing sustainability and validate this against applicable awards or enterprise bargaining arrangements
- confirm allowances have been made for on-boarding of new staff, leave loading, training, uniforms as well as equipment, which we review for suitability and whether they are fit for purpose for our centres
- review staffing charts to confirm resourcing is adequate, workloads are safe and can be sustainably managed, considering comparable centres and activities
- review past performance in relation to work health and safety, sub-contracting arrangements and worker entitlements.

During 2020, we completed three cleaning tenders and new contracts for cleaning services were awarded at Westfield Mt Druitt, Westfield Hornsby and Westfield Parramatta following these processes.

For higher risk suppliers such as cleaning and security, we also obtain monthly confirmation from suppliers that their workers are paid in accordance with applicable awards or enterprise bargaining arrangements and review rostering and workplace health and safety metrics quarterly.

## 6.4 Our ongoing engagement with our suppliers and their staff

Our site and centre management teams support formal and informal engagement with our suppliers and their staff. How we do this depends upon the nature of the services being provided by our suppliers.

Where services are provided on our sites, such as cleaning and security:

- supplier team members complete an induction process managed by us which covers work health and safety, emergency procedures, risk and hazard identification, and our behavioural expectations
- we undertake monthly work health and safety observations to ensure that work practices are carried out safely, with any non-compliance documented and tracked to resolution
- we regularly engage with team members in face-to-face meetings, including daily morning huddles, weekly team meetings, monthly safety forums and emergency response training, and run team talks to focus on areas such as lost time injuries and to gain feedback to improve our management and operational processes.

We display information in centre management offices and lunch rooms letting team members know how they can raise any concerns about work practices or other grievances with Scentre Group directly.



## CASE STUDY

## Our cleaning team members are an integral part of our Westfield Living Centre customer experience teams

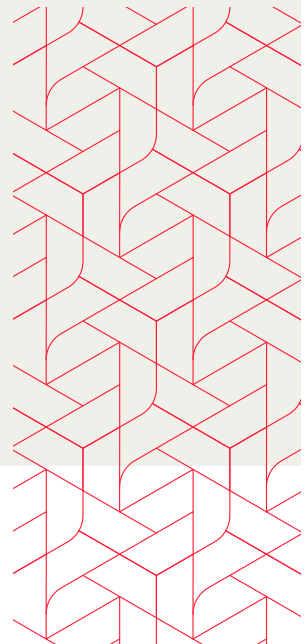
Our service promise – *we are real people creating moments that matter* – empowers our teams to deliver extraordinary experiences for our customers every day.

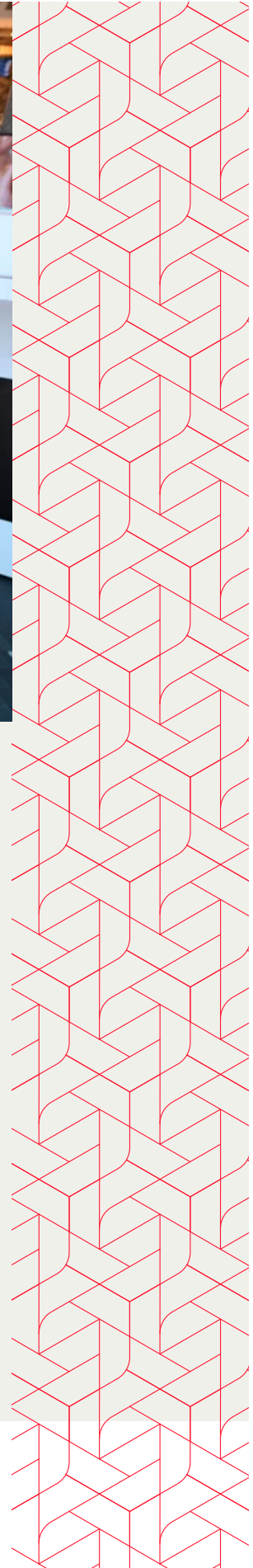
Our cleaning team members are an integral part of our Westfield Living Centre customer experience teams and their dedication, service and effort is paramount in achieving our service promise. Our cleaning team members are contractors yet wear the same Westfield uniforms as all other operational teams so that the customer experience is seamless and we create an inclusive team culture. Our management team engage directly with cleaning team members on a daily basis and we deliver on our service promise as one team.

We have over 1,700 cleaning team members in our centres with their tenure often maintained when cleaning suppliers change. When commencing a new contract we encourage cleaning providers to retain key staff, which on average has been maintained at 80 per cent on rollover. Over 150 of our valued cleaning team members have worked with us for more than 10 years. We recognise and celebrate their achievements across our business.

Our centre management teams support formal and informal engagement with cleaning team members about our working environments. We undertake monthly work health and safety observations to ensure that work practices are carried out safely, with any non-compliance documented and tracked to resolution. We also run cleaning team talks to focus on areas such as lost time injuries and to gain feedback to improve our management and operational processes. We display information in centre management offices and lunch rooms so that cleaning team members know how they can raise concerns.

Members of our cleaning team attend and contribute to relevant operational team meetings such as the daily morning huddle, monthly safety forum, emergency response training and regular toolbox talks, so that health, safety and security matters can be discussed and resolved within the relevant team environment. These operational meetings are important for regular training and keeping our cleaning team members up to date with the latest information that may inform their work, and they are paid to attend.





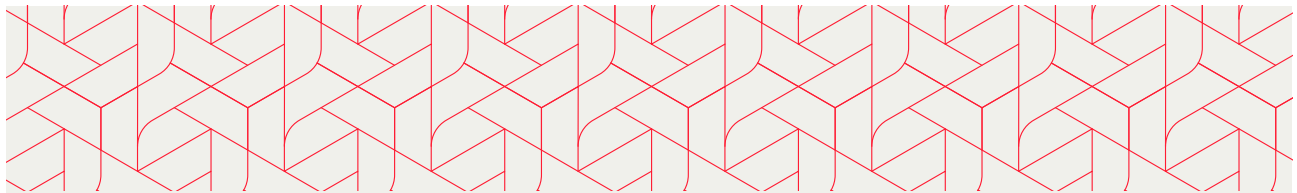
In May 2020 a member of the cleaning team at Westfield Miranda was recognised in our SCG Heroes Awards, which are open to everyone within our business, as a ‘Safety Hero’ for their quick and present action in identifying and coming to the aid of a youth contemplating self-harm.

Our long-term strategy is focused on enabling safe, fair and equitable working conditions. We engage independent auditors periodically to review our cleaning contractors’ financial and work practices.

During 2020 there were eight matters raised by cleaning team members that required our intervention to achieve a resolution for cleaning team members. These matters related to employment conditions, bullying and harassment, adequacy of resourcing and the work environment.

All of these matters were raised directly by cleaning team members with Scentre Group and all matters were resolved with positive outcomes with seven of them resolved in collaboration with the cleaning supplier involved. The remaining cleaning supplier was issued with a breach notice and was excluded from tendering for any new contracts until an independent audit verified remedial actions had been implemented.

## 7. Our 2021 roadmap



**We recognise that how we engage with modern slavery in our operations and supply chain is an ongoing and continuously evolving process. Although our direct operations are at lower risk of modern slavery, better understanding our supply chain and business partnerships provides us with an opportunity to enhance our legacy in eradicating modern slavery.**

**Building on the work we have already carried out, we have identified the following opportunities for 2021.**



### Education and training

- Identify areas where our procurement and contract management staff may need further training on modern slavery risk and supplier management.
- Expand the opportunities our people have to raise their awareness about modern slavery.



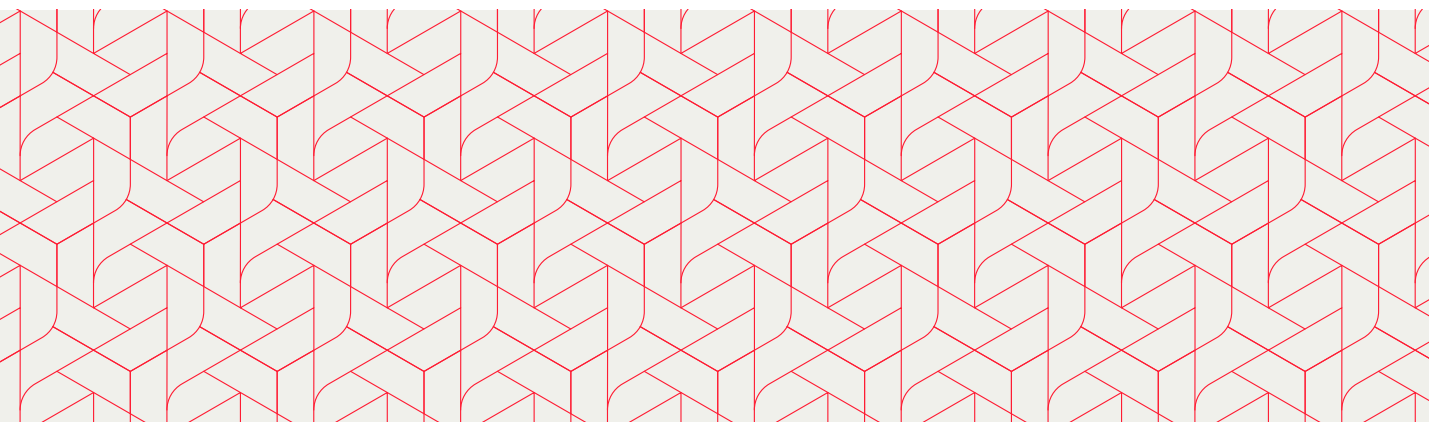
### Supplier engagement and due diligence

- Review supplier self-assessment results to identify any additional areas of high risk, gauge supplier understanding and engagement.
- Identify opportunities to supplement our procurement and tender processes based on the results of our supplier self-assessment.
- Work with identified high-risk suppliers to agree an approach for addressing any identified high-risk modern slavery indicators.
- Look for opportunities to engage with our suppliers and their staff to provide education and training on modern slavery.
- Launch a recognition program for our in-centre cleaning and security teams.



### Risk and assurance processes

- Consider whether additional risk assessments should be conducted in light of the results of our supplier self-assessments.
- Enhance internal assurance of our procurement and contract management processes to better identify, assess and address the risks of modern slavery.



How Scentre Group addresses the mandatory reporting criteria under the Modern Slavery Act 2018 (Cth) is set out below:

| <b>Reporting criteria:</b>   | <b>Where we do this:</b>   | <b>More information can be found in:</b>                          |
|--|--|---|
| Identify the reporting entity  | About this statement   | <a href="#">Scentre Group 2020 Annual Financial Report</a>        |
| Describe the reporting entity's structure, operations and supply chains  | 1. Message from the Chief Executive Officer                                  | <a href="#">Scentre Group 2020 Annual Financial Report</a>        |
|  | 2. About Scentre Group   | <a href="#">Scentre Group 2020 Responsible Business Report</a>    |
| Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls                              | 4. Our approach to governance  |   |
|  | 5. Our approach to risk management in our direct operations and supply chain |   |
|  | 6. Our supply chain engagement   |   |
| Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes | 3. What we achieved in 2020  |   |
|  | 5. Our approach to risk management in our direct operations and supply chain |   |
|  | 6. Our supply chain engagement   |   |
| Describe how the reporting entity assesses the effectiveness of these actions  | 5. Our approach to risk management in our direct operations and supply chain |   |
| Describe the process of consultation with any entities that the reporting entity owns or controls  | About this statement   |   |
| Provide any other relevant information   | Case study: Our cleaning team members  | <a href="#">Scentre Group 2020 Annual Financial Report</a>        |
|  | 3.2 Working with our suppliers to respond to COVID-19                        | <a href="#">Scentre Group 2020 Corporate Governance Statement</a> |
|  | 7. Our 2021 roadmap  | <a href="#">Scentre Group 2020 Responsible Business Report</a>    |

## SCENTRE GROUP

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