



modern slavery statement.

For the year ended 30 June 2021

About this modern slavery statement.

We are committed to the protection of human rights and recognise the importance of ensuring responsible operations and sustainable procurement practices throughout our supply chains.

Growthpoint does not tolerate non-compliance with modern slavery laws or infringement of human rights. This statement builds on the foundation we established in our first modern slavery statement by providing a detailed summary of the progress made by Growthpoint to identify, mitigate and address modern slavery risks during the reporting period.

We acknowledge the need for continued action to mitigate the risks of modern slavery across our operations and supply chains, both to protect the human rights of those involved in our business, and to ensure the long-term sustainability of Growthpoint. To support this, we also disclose our proposed actions to further strengthen our response to modern slavery risks for the next reporting period and beyond.

This is the second modern slavery statement for Growthpoint Properties Australia, a stapled entity structure, comprising Growthpoint Properties Australia Limited (Company) and Growthpoint Properties Australia Trust (Trust) (Growthpoint).¹ The Company and the Trust are stapled together and trade jointly on the Australian Securities Exchange (ASX) under the ASX code GOZ. The Company is the responsible entity of the Trust.

This single reporting entity statement for Growthpoint explains the actions we have taken to assess and address modern slavery risks in our operations and supply chains, during the financial year ending 30 June 2021 (FY21), pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) (Act).

This statement was approved by the Board of Growthpoint Properties Australia Limited on behalf of itself and as responsible entity for the Growthpoint Properties Australia Trust on 23 November 2021.

Timothy Collyer
Managing Director
Growthpoint Properties Australia

23 November 2021



modern slavery includes: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.²

1. In this statement a reference to 'Growthpoint', 'Group', 'we', and 'our' is to Growthpoint Properties Australia and its controlled entities as outlined in our FY21 Annual Report.
2. An interpretation of the definition of 'modern slavery' in the *Modern Slavery Act 2018* (Cth).

Reporting requirements of the Act.

Please see the below page numbers of this statement that address each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page No.
Identify the reporting entity	1
Describe the reporting entity's structure, operations and supply chains	3-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	7-8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	9-12
Describe how the reporting entity assesses the effectiveness of these actions	13
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	14
Any other information that the reporting entity considers relevant	14

Key highlights in FY21.



Employee training

Provided mandatory training on how to identify modern slavery risks to all full-time employees



Procurement processes

Developed an internal modern slavery questionnaire and introduced a requirement for building and construction suppliers for contracts above \$150,000 to complete the questionnaire as a tender pre-requisite



Asset management contracts

Updated agreements with our external property managers to include modern slavery contractual provisions

Our operations.

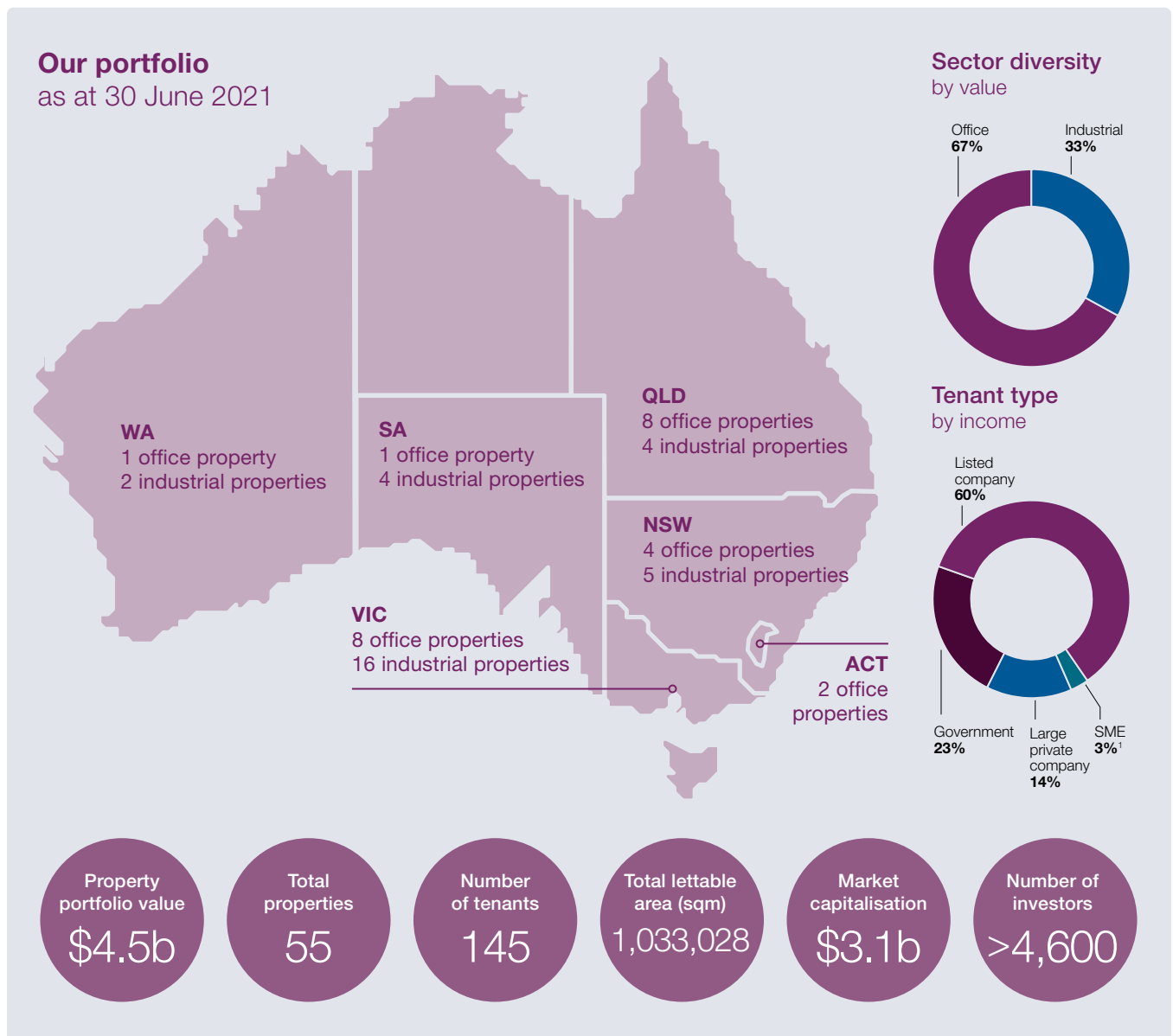
Growthpoint is a real estate investment trust (REIT), listed on the ASX, and is part of the S&P/ASX 200 Index. For more than 12 years we've been investing in high-quality industrial and office properties in Australia. As at 30 June 2021, we owned and managed 55 properties across Australia, valued at approximately \$4.5 billion.

Our business operations

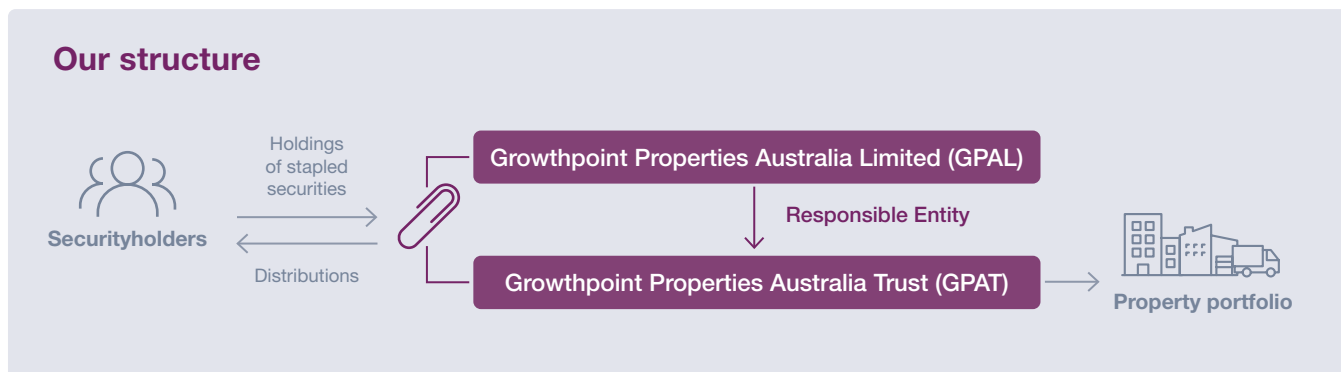
Our business operations include asset management, capital expenditure programs, project management, responsible entity and trustee services for sub-trusts and associated

corporate operations to support the primary business of being a professional landlord. The majority of Growthpoint's earnings is received from rental income from our tenants with ancillary income from investment dividends and interest revenue.

Our business operations are underpinned by a commitment to operating in a sustainable way. We believe that by making our business more sustainable and being a positive contributor in the communities in which we operate, that this will assist with our primary objective of providing our Securityholders with sustainably growing income returns and long-term capital appreciation.



Our operations.



Our corporate structure

Growthpoint and its controlled entities are domiciled in Australia and our operations are subject to Australian laws. Growthpoint has an internalised management, governance and reporting structure for the Company and Trust. The reporting entity under this statement is Growthpoint, however due to our centralised governance structure, all controlled entities are subject to the same policies, procurement and management. Accordingly, this statement also covers the operations and the supply chains of the Group.

A full list of controlled entities for FY21 is provided on page 96 of our [FY21 Annual Report](#). Further information about Growthpoint’s business is also provided in that report.

Our direct workforce

As at 30 June 2021, Growthpoint directly employed a team comprising 32 full-time employees, one permanent part-time employee and two casual employees, to support our business operations. Employees provided professional services across asset management, valuations, legal, compliance, risk, finance, projects and corporate functions.

Our head office is located in Melbourne. All employees work from our head office except for two employees who were based in offices in Sydney and Brisbane. Due to the COVID-19 pandemic, our Melbourne and Sydney based employees were subject to extended work from home directives during the reporting period.

Further information about our permanent workforce is available on pages 36-39 of our [FY21 Sustainability Report](#).

Our people

as at 30 June 2021

Total FTE employees

33

Casual employees

2

Male 51.4%
Female 48.6%

Our values

underpin everything we do

Respect

Success

Inclusion

Integrity

Fun

Our supply chain.

Growthpoint’s business operations and investments are based wholly within Australia. The majority of our suppliers are Australian based companies. During FY21, Growthpoint transacted with approximately 660 suppliers, either directly or on our behalf through external property managers, to provide goods and services across the following three key areas.

Asset management

Asset management is an integral part of Growthpoint’s supply chain. We have appointed two external multinational property management companies, JLL and CBRE (external property managers), to engage contractors and suppliers on our behalf as part of the day-to-day maintenance and operations for our properties. We recognise that these external property managers procure a number of high-risk services, such as cleaning, security, maintenance and building services that are essential to the management of our assets. Our external property managers are required to report under the Act and provide their yearly modern slavery statements to the Modern Slavery Task Force (MSTF).¹

Development and projects

Growthpoint directly engages contractors, suppliers and consultants in connection with the development of our assets, refurbishment works, fit-out projects and large capital expenditure projects. These suppliers cover the full development process and include design, construction, planning and project management. We generally only engage Australian-based construction companies. We recognise that these suppliers may need to procure raw materials for our properties from outside of Australia and that these Tier 2 (and below) suppliers of construction materials are directly linked to Growthpoint’s supply chain. Suppliers are generally not permitted to subcontract services without the prior approval of Growthpoint.

Corporate operations

We have a centralised procurement practice for products and services that assist with corporate office operations and administering the Group’s business including legal, valuations, sustainability, finance and tax professional advice. We procure external professional advice from Australian-based professional service firms, sourced predominately from a list of approved key suppliers, however subject to business needs, we may obtain advice from other high-quality service providers. These approved key suppliers are engaged to provide services critical to the day-to-day operation of Growthpoint as determined by either Growthpoint’s Board or Executive Management Team.

Growthpoint procures information technology (IT) equipment in connection with its corporate operations through global IT manufacturing and supply companies.

Growthpoint transacted with

~660

suppliers across the following key areas:



Asset management

Day-to-day management, maintenance and operations of our properties



Development and projects

Construction and labour services undertaken by building contractors and raw material suppliers for our fit-out projects and developments



Corporate operations

- Professional and financial services
- IT products and services
- Procurement of travel, accommodation and marketing merchandise

1. Please see the overview and composition of the MSTF outlined on page 6.

Our governance and policies.

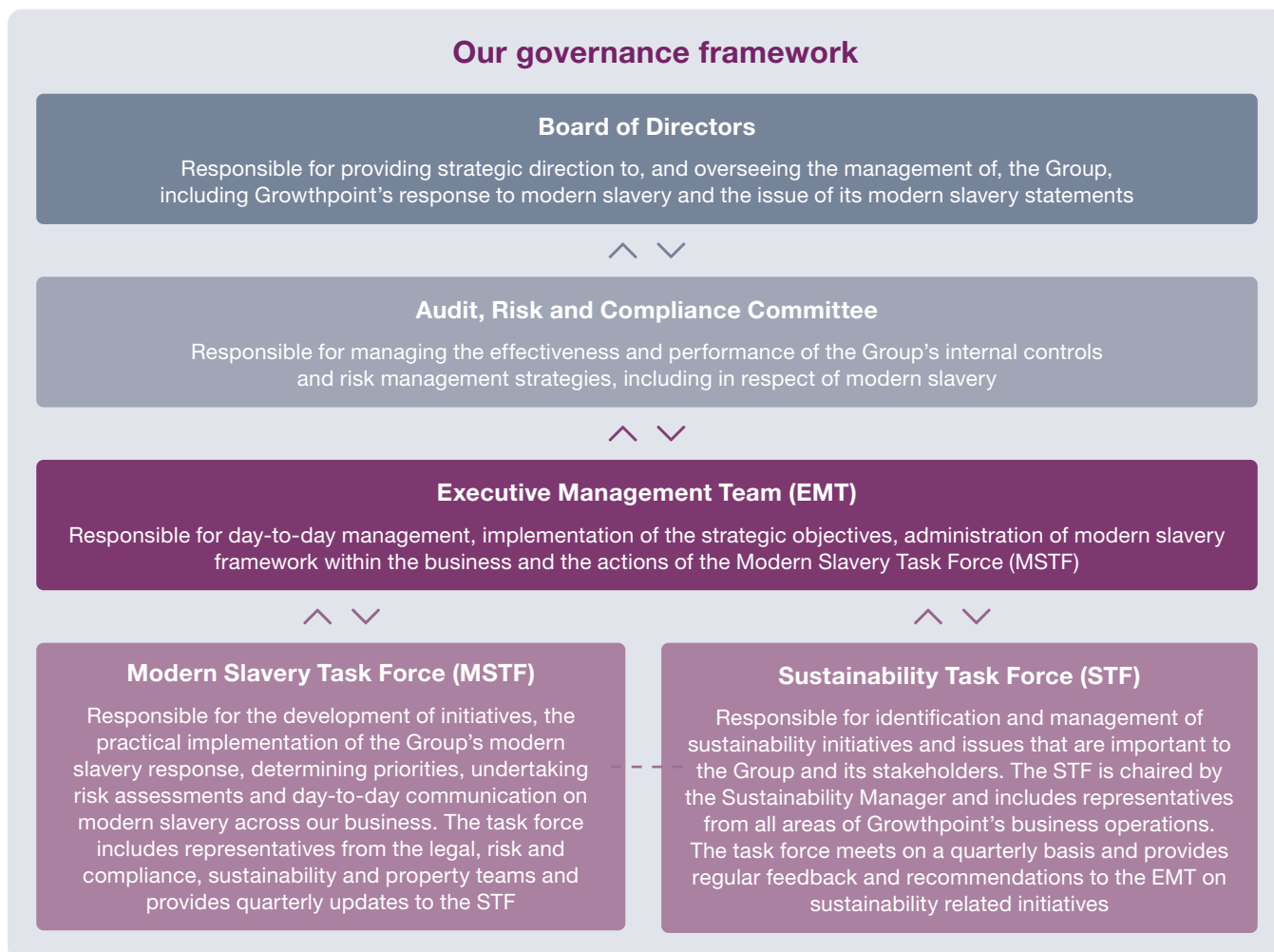
Growthpoint is committed to ensuring that its procedures and practices reflect a high standard of corporate governance. The Group’s governance framework aims to ensure accountability, transparency and effective risk management, and reinforce a culture of acting ethically, responsibly and in the best interests of Securityholders.

The Board has overall responsibility for the establishment and oversight of the Group’s risk management framework. The Board has established the Audit, Risk and Compliance Committee, which has oversight of the Group’s compliance and risk management framework, which includes modern slavery risks.

Growthpoint’s commitment to responsible work practices is underpinned by various internal policies including the Growthpoint [Code of Conduct](#), [Anti-Bribery and Corruption Policy](#), [Whistleblower Policy](#) and [Diversity Policy](#). These policies are applicable to the entire Group

and we take compliance and the implementation of our policies seriously. To ensure a robust corporate governance program, regular updates on changes to key policies are communicated to employees. All policies are centrally located on Growthpoint’s internal system, and are available to download from our website. The MSTF has established itself within the business as a point of contact for modern slavery queries on procurement. The Audit, Risk and Compliance Committee will be informed of any breaches of these policies and any material breaches will be reported to the Board and external auditors.

Our suppliers, contractors and service providers must adhere to our [Supply Chain Sustainability Guidelines](#) which require all suppliers to comply with modern slavery, labour practices, freedom of association and human rights legislation. Growthpoint must be notified of any concerns about actual or suspected breaches of these guidelines. We require our suppliers to provide the guidelines to all of their employees who are providing services to Growthpoint.



Identifying risks of modern slavery practices.

Determining where Growthpoint may be involved in modern slavery


Growthpoint is aware that in order to address modern slavery risks within our operations and supply chains, we need to identify how Growthpoint may **cause**, **contribute** or be **directly linked** to modern slavery risks. We consider our risk of causing or contributing to modern slavery in our internal operations to be low. In order to make the most impactful changes, our focus as a Group is on circumstances where Growthpoint may be directly linked to modern slavery risks through the procurement of asset management services, as well as labour and materials for developments and projects.

Risks in our operations

Growthpoint's direct employees comprise a small team of skilled professionals working exclusively within Australia. All employees are paid a competitive remuneration package benchmarked to relevant remuneration data and above the Australian minimum wage for award employees. Our employment process is regulated by Australian laws, including the *Fair Work Act 2009* (Cth) and applicable awards. Accordingly, we consider our operations to be low risk for forced labour or unpaid work, debt bondage, human trafficking or other risks that may cause modern slavery practices.

Risks in our supply chain

In our first modern slavery statement, we identified that our highest potential risk of exposure to modern slavery practices is through the procurement of operational maintenance suppliers by our external property managers as part of the




The United Nations Guiding Principles on Business and Human Rights sets out a three-part continuum defining how businesses may be involved in modern slavery:¹

- › **cause:** where their actions directly result in modern slavery occurring;
- › **contribute:** where their actions or omissions contribute to modern slavery occurring; and
- › **directly linked:** where they are connected to modern slavery through their products, services or operations.

day-to-day management and maintenance of our properties. This was determined based on the underlying industry specific risks in the procurement of higher risk operational maintenance contractors such as cleaning, landscaping, maintenance and security services. We are aware that these risks associated with operational maintenance suppliers are inherent to the property industry and ongoing, and that risks for certain suppliers have been heightened due to the COVID-19 pandemic, such as due to the increased focus and demand on the cleaning services sector.

Growthpoint is directly linked to operational maintenance suppliers as they are procured on our behalf by our external property managers.

Targeting net zero 2025 – risks related to procurement of solar panels



As we move towards our target of net zero emission by 2025, onsite solar investment will play an important part of achieving that goal. Growthpoint is aware of the findings from the Sheffield Hallam University report on the modern slavery risks, predominately forced labour, related to the production of solar panels within the Xinjiang Uyghur Autonomous Region of China.²




Growthpoint is seeking to pre-qualify suppliers of solar panel materials in FY22 to understand their processes of mitigating modern slavery risks in the procurement of solar panels.

1. Guiding Principles on Business and Human Rights – Implementing the United Nations “Protect, Respect and Remedy” Framework, 2011.
2. Sheffield Hallam University – ‘In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains’, 2021.

Identifying risks of modern slavery practices.

High-risk areas within our supply chain

The following high-risk areas within our supply chain may be directly linked to modern slavery practices:

Supply chain key area	Industry	Services provided	Reasons ¹
Asset management 	Property management and operations <i>Day-to-day management, maintenance and operations of our properties</i>	Growthpoint has appointed external property managers to manage our properties on our behalf and to engage operational maintenance providers.	We recognise that these suppliers have an inherent risk to modern slavery as manual unskilled labour is often low paid and frequently employed on a casual or temporary basis. Such workers may also be from vulnerable demographics, including from migrant, low socioeconomic, or culturally and linguistically diverse backgrounds. These factors often mean that workers may be unaware of their rights and less likely to self-report.
Development and projects 	Construction and labour services <i>Construction and labour services undertaken by building contractors and raw material suppliers for our fit-out projects and developments</i>	Growthpoint either directly engages contractors in the construction industry or our external property managers enter into small scale works agreement on Growthpoint's behalf.	We consider the key risk for the construction industry to be products or materials sourced from countries with a higher risk of labour exploitation. The complexity of the construction industry supply chains reduces the oversight on indirect suppliers (in particular, overseas suppliers who provide raw materials due to a lack of visibility over the supply chain). There is also a risk that sub-contracting of services may occur without approval or knowledge.
Corporate operations 	Information technology (IT) equipment <i>Procurement of IT products and services</i>	Growthpoint procures computers, printers, software and mobile phones for our business operations through global IT manufacturing companies.	Due to the low transparency in the supply chain for components of IT equipment, and the lack of leverage with suppliers of raw materials, we recognise that there are inherent risks related to the procurement of equipment needed to support our business operations. In particular, we understand that most IT products are made in countries which often have a high prevalence of modern slavery risks and there is limited opportunity to trace all components.
	Corporate operations <i>Procurement of travel, accommodation and merchandise</i>	Growthpoint directly procures travel and accommodation for employees, and hospitality services and merchandise for employees, tenants and stakeholders.	Although we have not used many of these services in FY21 (due to the COVID-19 pandemic), we are aware that hospitality and back-of-house service staff in accommodation settings are often migrant workers, employed on a casual or temporary basis and subject to demanding working hours, therefore heightening the risk of modern slavery. We recognise branded merchandise products may be imported from countries without a transparent supply chain and could be made subject to forced or unpaid work, or child labour.

Addressing high-risk areas within our supply chain

Growthpoint will continue to prioritise resources and initiatives towards the procurement of asset management and operations and construction and labour services as these are the areas where Growthpoint considers it can mitigate modern slavery risks due to the leverage associated with being 'directly linked' to these suppliers or contractors. We will continue to assess and monitor changes to the other areas identified as high-risk and increase our knowledge of our supply chain.

1. KPMG and Australian Human Rights Commission 'Property, construction & modern slavery – practical responses for managing risk to people', 2020.

Our approach to assessing and addressing modern slavery risks.

Mitigating modern slavery risks in our operations

We are committed to ensuring that Growthpoint is a great place to work. We support all employees in achieving their professional best through our strong governance framework of internal policies, living our values and fostering an environment that is inclusive, supportive and diverse.

Our focus as an employer is to ensure we are providing and maintaining a safe and healthy workplace for all our people. Key activities we undertake to manage and uphold high standards for Growthpoint's direct employees include:

- › provision of compulsory training for all employees on our Code of Conduct, modern slavery and workplace behaviour;
- › basing all recruitment and promotions on merit, performance and capability, fair employment practices and benchmarking of salaries;
- › flexible workplace arrangements;
- › undertaking a yearly employee engagement and alignment survey to understand our employee's views on business operations; and
- › ensuring all new employees of Growthpoint receive individual training on our policies, including modern slavery awareness, from our Risk and Compliance Team.

77% employee engagement score in FY21, inline with our FY20 result and in the top quartile of our benchmark group

More information about our approach to maintaining a healthy and safe workplace, our employee wellbeing programs and the support provided to employees during the COVID-19 pandemic can be found in our [FY21 Sustainability Report](#) on our website.

Providing modern slavery training to all employees

During the reporting period all direct Growthpoint employees completed a mandatory modern slavery training session developed by an external law firm in conjunction with the Growthpoint legal team. The session focussed on assisting employees to identify key modern slavery risks in the property industry, provided direction on how operation-level employees can engage with contractors and practical tips for recognising modern slavery risks in procuring goods and entering into maintenance agreements.

100% of full-time employees attended mandatory training on modern slavery during FY21¹

Review of operational maintenance contractors and suppliers

During the reporting period, the MSTF further engaged with Growthpoint's two external property managers to better understand their internal policies and approach to identifying suppliers of higher-risk services and their due diligence process as part of onboarding suppliers.

Our external property managers are responsible for engaging operational maintenance contractors and suppliers on behalf of Growthpoint. Operational maintenance services are critical to asset management and our business as a professional landlord, given the importance on these suppliers, we aim to leverage our influence in the procurement of these services by requiring our external property managers to include modern slavery considerations as part of their tender processes. Growthpoint will continue to collaborate with our external property managers on modern slavery control activities and initiatives.

Both external property managers have their own pre-qualification and due diligence process for appointing operational maintenance contractors, including specific targeted questions and certification requirements to address both modern slavery risks and broader compliance with laws. We have a long and ongoing relationship with our external property managers, and our internal asset managers work closely with their counterparts at the external property managers and have oversight on the procurement appointments by our external property managers within our portfolio.

1. Excluding two full-time employees who were on parental leave at the time of the training.

Our approach to assessing and addressing to modern slavery risks.

Growthpoint introduced procurement plans to specifically require all operational maintenance suppliers engaged by our external property managers, to be onboarded and pre-qualified by their respective due diligence processes, including modern slavery risks. Any engagement of a service provider by an external property manager for an operational maintenance supplier that is not pre-qualified now requires prior approval by Growthpoint.

Enhancing procurement processes

As disclosed in our FY21 priorities, Growthpoint developed a modern slavery questionnaire to assist with reviewing and understanding the practices of direct suppliers in relation to their modern slavery risks. During the reporting period, the questionnaire was issued to our commercial cleaning contractors, engaged by our external property managers, to understand their modern slavery risks as detailed in our case study on page 11. Going forward, the questionnaire will be utilised by Growthpoint as a pre-qualification requirement in connection with the direct engagement of other high-risk suppliers.

Due diligence process for capital expenditure projects

As part of ongoing engagement with our external property managers, the MSTF identified that in certain circumstances, Growthpoint was tendering capital expenditure contracts to suppliers without formally onboarding the supplier through our external property manager's due diligence process (as external property managers focus on due diligence for operational maintenance suppliers). This was predominately limited to suppliers of a higher value for Growthpoint's developments and project operations whereby the contractor or supplier may only be engaged on a one-off basis, and had usually gone through a competitive tender process.

To address this gap, the MSTF has set a requirement that, prior to engagement, all contracts with building and construction consultants, suppliers or contractors for capital expenditure work over \$150,000 must be pre-qualified by either Growthpoint's external property manager or directly by Growthpoint through the completion of Growthpoint's modern slavery questionnaire. The engagement of consultants, suppliers or consultants for works or repairs below this amount would usually fall within the operational maintenance requirements of our external property managers, rather than Growthpoint's formal capital expenditure program.

As part of the implementation of this new requirement in FY22, each questionnaire response is to be reviewed by the MSTF in the context of the relevant procurement for the capital expenditure project. It is intended that responses remain valid for 12 months after which re-verification will be required if Growthpoint continues to engage the supplier. An update on the effectiveness of this initiative will be provided in our next statement.

Enhancing modern slavery provisions in property management agreements

During FY21, Growthpoint updated the asset management agreements, which govern the appointment of our external property managers, to specifically include modern slavery contractual obligations. The agreements require our external property managers to comply with modern slavery laws and our Supply Chain Sustainability Guidelines. Furthermore, the agreements now require our external property managers to ensure they, and their contractors, allow Growthpoint to inspect records dealing with modern slavery laws and allow Growthpoint's employees access to interview their employees or inspect operations upon reasonable prior notice. These provisions give Growthpoint an additional avenue to undertake due diligence of our higher-risk suppliers going forward.

These changes are in addition to our existing modern slavery contractual provisions incorporated into our consultancy and works agreements with suppliers, consultants and contractors during FY20, which we discussed in our first modern slavery statement.

Engagement with key suppliers

In FY21, we updated the annual performance review of our key suppliers required in relation to the operation of the Trust (including our external property managers) to include a specific requirement for those suppliers who are required to prepare a modern slavery statement under the Act, to provide their modern slavery statement to the MSTF for Growthpoint's records.

Our approach to assessing and addressing to modern slavery risks.



Case study: modern slavery risks in cleaning services

The ongoing COVID-19 pandemic has created a significant demand on the commercial cleaning services sector through the increased need for more regular, extensive and deep cleaning of premises and offices.

Growthpoint's commercial cleaning contractors are procured and managed on our behalf by our external property managers with direction on procurement, as required, by our internal asset managers.

We are acutely aware that commercial office cleaning is a high-risk industry for modern slavery risks due to the inherent nature of the workforce which performs manual unskilled labour, is frequently employed on a casual or temporary basis, lowly paid and often attracts migrant workers who may be unaware of their rights. We also engage high-rise window cleaning contractors which we consider to have a low modern slavery risk due to the requirement for employees to be highly skilled, work limited hours of the day and be fairly remunerated due to the risk of the work.

Our service agreements with commercial cleaners contain contractual provisions which set out our expectation that contractors comply with all relevant modern slavery laws and our Supply Chain Sustainability Guidelines. Given the heightened focus on cleaning contractors during the reporting period as a result of the COVID-19 pandemic, the MSTF engaged with cleaning service contractors through our external property managers to:

- > reinforce our requirement that cleaning service contractors comply with our Supply Chain Sustainability Guidelines by re-issuing these guidelines to all contractors; and
- > issue our modern slavery questionnaire to all cleaning contractors to develop a greater understanding of the approach and controls adopted by contractors to mitigate modern slavery risks.

In June 2021, all 11 commercial office cleaning and four high-rise window cleaning contractors, engaged by external property managers on Growthpoint's behalf, returned a response to our modern slavery questionnaire. These responses were reviewed against the questionnaire criteria and additional information on policies and practices were requested to clarify responses.

The responses provided by the commercial office cleaning contractors on the modern slavery questionnaire indicate the following:

- 100%** were considered to have a basic understanding of modern slavery
- 90%** had grievance mechanisms in place
- 73%** provided training on modern slavery risks
- 73%** assessed modern slavery risks in their operations
- 73%** had a policy relating to modern slavery or human rights abuse

Overall, the results from the questionnaire indicate that our commercial office cleaning contractors are aware of the importance of modern slavery within their business and our contractors have adopted different levels of policies, training and practices for their staff. Conversely, the responses from our high-risk window cleaning contractors reveal that these contractors were less focussed on modern slavery risks due to the earlier disclosed factors which indicate a low risk of modern slavery.

During FY22, we will use these initial insights to work with both our external property managers and the cleaning contractors to improve their modern slavery knowledge and compliance through engagement, education and additional communications provided by our external property managers.

To reduce the risks of modern slavery at the procurement stage going forward, the MSTF are engaging with our external property managers to develop a better understanding of their own internal risk assessment and procurement matrixes in respect of cleaning contractors. This is an ongoing project by Growthpoint and the aim is to help us identify potential modern slavery risks during the procurement phase (in addition to the use of the self-assessment modern slavery questionnaire) and to assess how we can streamline the engagement of pre-qualified cleaners, such as through the establishment of a panel of cleaners across our portfolio.

Growthpoint will continue to work with both our external property managers, our tenants and our commercial cleaning contractors as the need for services further increases as employees return to working in an office environment throughout FY22.

Monitoring and remediation processes.

Existing avenues for reporting and responding

Growthpoint has a number of mechanisms through which concerns regarding modern slavery can be reported, including:

- › **Whistleblower Policy:** encourages the reporting of any misconduct or an improper state of affairs or circumstances, including any illegal activity, such as modern slavery, by Growthpoint employees, directors, suppliers and relatives of these individuals. The policy is readily accessible by all Growthpoint employees and the avenues for reporting (including anonymous reporting) are disclosed in high thoroughfare places throughout Growthpoint's head office.
- › **Code of Conduct:** requires the reporting of any unlawful and unethical behaviour or a breach of the Code of Conduct to be reported to the Managing Director or the Chairman of Growthpoint. This policy is readily accessible by all Growthpoint employees.
- › **Supply Chain Sustainability Guidelines:** requires suppliers to notify Growthpoint of any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities. These guidelines are attached to individual consultancy, service and works agreements directly entered into by Growthpoint and those procured on behalf of Growthpoint by our external property managers.

In addition, our external property managers have their own grievance processes for suppliers they have engaged who provide services at Growthpoint's properties.

We are committed to working with our suppliers to enhance their modern slavery knowledge, and in circumstances where a potential issue is identified, to pro-actively respond and seek to understand the issue and implement necessary steps to remediate any incidents of modern slavery. If the supplier or consultant does not actively respond or implement the required steps to improve or rectify their compliance with the Act or a significant breach of obligations at law occurs, including in respect of modern slavery, then Growthpoint will consider exercising its contractual rights.

Seeking ways to improve how we report and respond

Growthpoint is aware of the importance of ensuring that a clear and practical framework for reporting and responding to modern slavery risks is made available throughout our operations and supply chain. While the noted grievance mechanisms are available for reporting modern slavery risks, the MSTF will develop a remediation process to establish guidelines in responding to any reported instances of modern slavery during FY22 as we continue the enhancement of our modern slavery processes and initiatives.

Measuring effectiveness.

Growthpoint recognises that measuring the effectiveness of our approach to mitigating modern slavery risks is an ongoing and collaborative process across our business and with our suppliers.

Our approach during the reporting period included the following:

- > the cross-functional MSTF met regularly to focus on modern slavery processes and initiatives, and actively reviewed and monitored Growthpoint's modern slavery priorities and provided updates to the STF and relevant members of the EMT;
- > members of the MSTF attended industry training to understand best practice and new developments;
- > undertook benchmarking of employees' remuneration against relevant remuneration data and relevant current awards to ensure compliance;
- > completed an annual employee survey to assess the health, safety and wellbeing of direct employees in our operations; and
- > undertook a supplier review of our cleaning contractors by requiring the completion of our modern slavery questionnaire as detailed in case study in this statement.

During the reporting period, Growthpoint did not receive any complaints of suspected or actual modern slavery incidents through the whistleblower regime or any other channels.

Tracking effectiveness against our FY21 priorities

The following actions were undertaken by Growthpoint in FY21 following our commitment to enhance our modern slavery initiatives and processes:

- > **Training:** enhanced the knowledge of existing employees through mandatory training on how to identify modern slavery risks, including in particular in relation to the property sector, and introduced modern slavery awareness training for all new starters, as part of Growthpoint's induction program.
- > **Risk assessment:** targeted due diligence for commercial cleaning contractors through increased engagement and a concentrated modern slavery assessment as set out in our case study on page 11.

- > **Procurement processes:** developed an internal modern slavery questionnaire and introduced a requirement for building and construction suppliers for contracts above \$150,000 to complete the questionnaire as a tender pre-requisite.
- > **Supplier contracts:** strengthened agreements with external property managers to include modern slavery contractual provisions, including audit and inspection rights, with suppliers and introduced formal procurement plans.

We will monitor the effectiveness of these actions in FY22 and beyond, through the following measures:

- > collaborating with our external property managers to assess our supplier's compliance with our modern slavery initiatives, the Act and our Supply Chain Sustainability Guidelines;
- > reviewing key policies and relevant frameworks to capture any amendments at law; and
- > provide further training to employees to determine the implementation of modern slavery risk mitigation strategies and awareness of modern slavery risks.

Growthpoint will develop additional measures to monitor the effectiveness of our actions as part of future statements, including on the ground and in person activities to monitor effectiveness both within the operations of Growthpoint and with suppliers.

Consultation and approval

This statement was prepared by the MSTF, and was subject to review, feedback and approval from the Group's centralised management, governance and reporting structure, including the Executive Management Team, Audit Risk and Compliance Committee and the Board.

Looking ahead.

Our priorities for FY22 and beyond are:

Knowledge and compliance

- > Develop a specific training session for the Growthpoint Board focussed on risk and reporting of modern slavery in our business and operations.
- > Continue to engage with employees, property managers and suppliers on modern slavery information, measures and initiatives.

Supply chain engagement

- > Monitor and review the effectiveness of the new tender requirement for all building and construction suppliers for contracts valued at more than \$150,000 to complete the modern slavery questionnaire.
- > Undertake a targeted pre-qualification process for the procurement of solar panel providers in respect of modern slavery risks.

Monitoring and remediation

- > Expand the scope of Growthpoint's risk assessment through the engagement of an external third-party consultant to undertake supply chain mapping.
- > Collaborate with our external property managers to assess our supplier's compliance with the modern slavery initiatives and the Act.
- > Develop a remediation process to guide any reported instances of modern slavery.