



FY21
MODERN
SLAVERY
STATEMENT

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INFORMATION ABOUT OUR MODERN SLAVERY STATEMENT

This is Vicinity Centres' ('Vicinity') second Modern Slavery Statement ('Statement') covering the Australian financial year from 1 July 2020 to 30 June 2021 (FY21) published in accordance with the Modern Slavery Act 2018 (Cth) ('the Act').

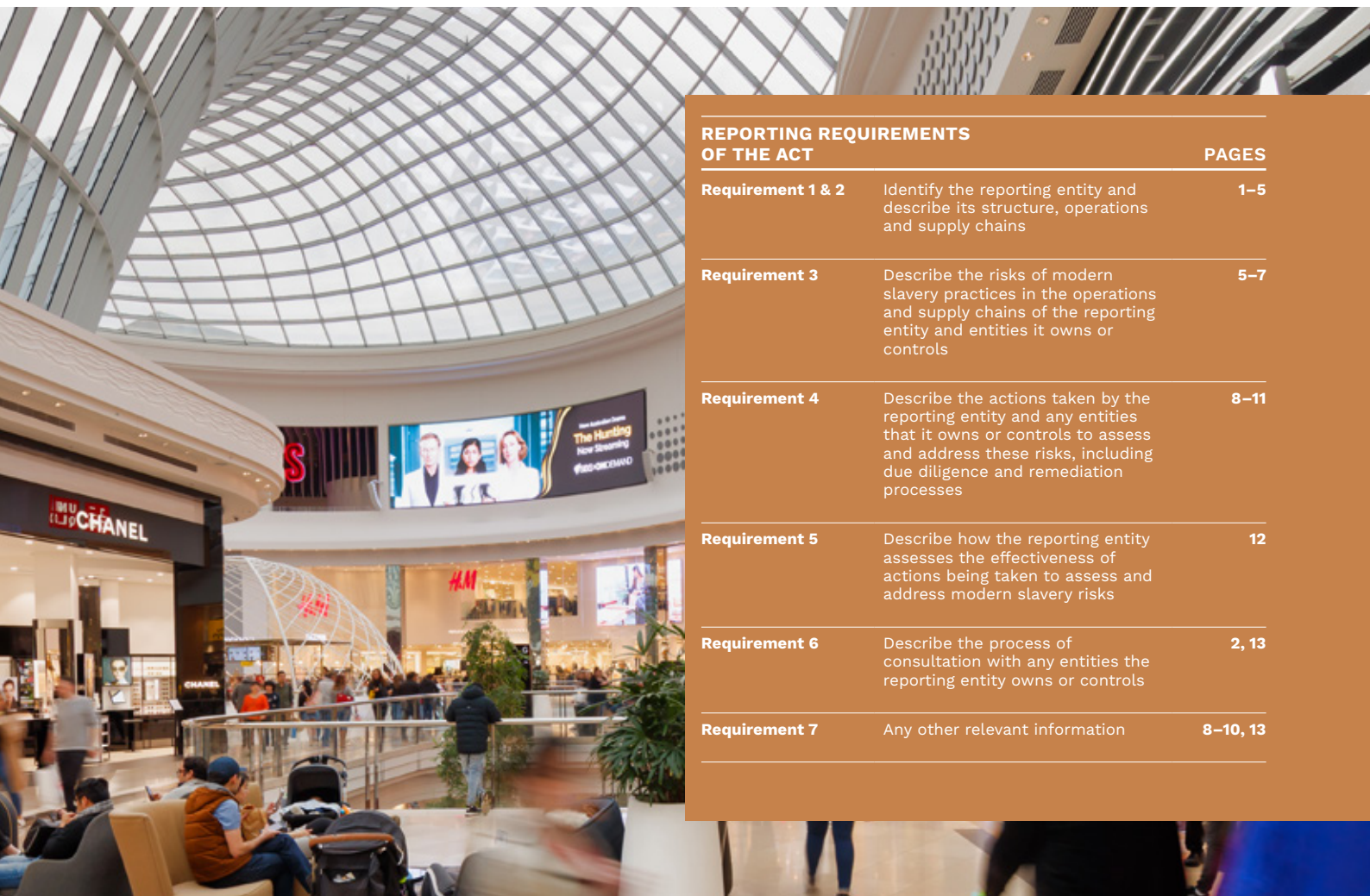
Vicinity Centres is a stapled group comprising Vicinity Limited (the Company) and Vicinity Centres Trust (the Trust). Shares in the Company and units in the Trust are stapled together and are traded collectively on the Australian Securities Exchange under the code 'VCX'.

This is a Joint Statement by the Company and the Trust, and it also covers all other mandatory reporting entities under the Vicinity Centres Group (collectively referred to as 'Vicinity Centres', 'Vicinity', 'Group', 'us', 'we' or 'our') in accordance with the reporting requirements under the Act, being:

- Vicinity Limited (ABN 90 114 757 783),
- Vicinity Centres Trust (ABN 72 680 499 767),
- Vicinity NVN Trust (ABN 43 813 342 348),
- Vicinity FIF Investment Trust (ABN 34 310 063 620),
- Vicinity Property Management Trust (ABN 83 026 144 869), and
- Vicinity Holdings Limited (ABN 79 167 087 363).

In the process of preparing this statement, Vicinity's General Counsel, the Sustainability Committee, the Risk and Compliance Committee and the Board have reviewed and provided feedback on its content.

The Statement was approved by the Board of Directors of Vicinity Centres on 15 December 2021.



REPORTING REQUIREMENTS OF THE ACT

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Requirement 1 & 2	Identify the reporting entity and describe its structure, operations and supply chains	1–5
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Message from our Chief Executive Officer & Managing Director



Dear Stakeholders

Vicinity Centres is committed to respecting and promoting the human rights of our employees, suppliers and the communities in which we operate, consistent with the International Bill of Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and the United Nations Guiding Principles on Business and Human Rights.

Continuous improvement of our processes to identify and uncover issues around modern slavery remains important for Vicinity, as does the prevention and remediation of such issues. Our Board remains focussed on ensuring transparency around our approach, processes and challenges to enable shared learning.

In FY21, we became Participants in the UN Global Compact, further strengthening our commitment in this space and we continue to collaborate with our peers across multiple sectors to help inform our approach. Furthermore, we established and convened our Modern Slavery Working Group, chaired by our Chief Operating Officer, in order to provide active engagement and feedback on the progress of Vicinity's Responsible Procurement Action Plan and actions to assess, address and mitigate modern slavery risks in our supply chain.

We will continue our efforts in FY22 to progress our Responsible Procurement Action Plan and play our part in reducing risk in our supply chains.

Grant Kelley
CEO and Managing Director

FY21 KEY ACTIONS



RISK ASSESSMENT

799 of our key suppliers involved in risk mapping exercise



EDUCATION

Modern Slavery Compliance Training introduced to all Vicinity team members



COLLABORATION

Became a participant to the United Nations Global Compact and collaborated with our peers through multi-sector knowledge sharing



POLICY

Updated our Supplier Code of Conduct to include more expectations of suppliers in relation to human rights and labour practices



GOVERNANCE

Established and convened our Modern Slavery Working Group, chaired by our Chief Operating Officer



Our business, operations & supply chain

OUR BUSINESS

As at 30 June 2021, Vicinity had 61 retail assets under management across Australia, valued at \$22.2 billion. Vicinity has an ownership interest in 59 of these assets, taking the value of its Direct Portfolio to \$13.5 billion. We also manage assets on behalf of our joint venture partners and wholesale fund investors, known as strategic partners. Vicinity also undertakes design and development of our assets to create mixed use precincts and continually enhance our core retail portfolio, with 12 town planning approvals and a further two town planning applications submitted in FY21.

Our retail assets range from local neighborhood centres to market leading destinations that compete on an international stage including Chadstone Shopping Centre, Emporium Melbourne, Sydney's Queen Victoria Building, The Galleries and the Strand Arcade, QueensPlaza in Brisbane and a quality portfolio of DFO centres.

The majority of Vicinity's earnings are derived from rental income from our retail tenants. Vicinity also derives ancillary income from a variety of streams, including electricity on-selling to tenants, car parking and digital media assets. Our national office is located in Melbourne, Australia, with regional offices in Sydney, Brisbane, Adelaide and Perth. We employ approximately 1,200 people across centres and corporate offices nationwide.

For more information about our business, refer to our [2021 Annual Report](#).

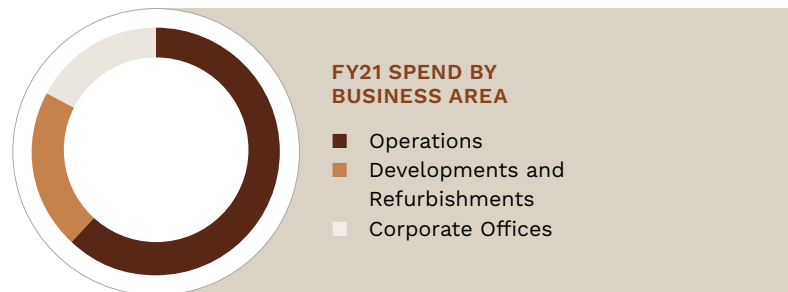
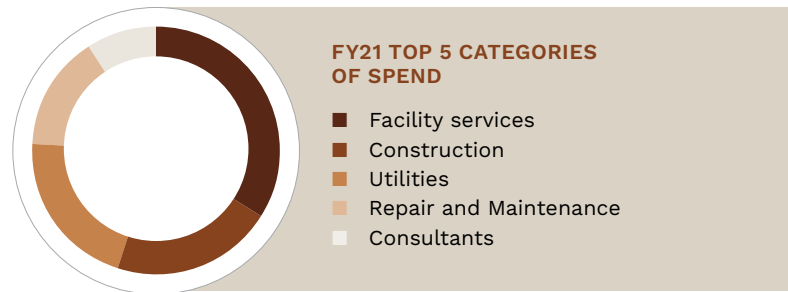
OUR SUPPLY CHAIN

In FY21 Vicinity directly engaged over 2500 suppliers to provide goods and services for our business, with an annual spend of \$469 million, distributed across three key activities that represent different aspects of our business. Due to the COVID-19 pandemic and subsequent lockdowns, reduced activity in the development and operational space led to a heightened focus on cost management resulting in a significant reduction in the number of our active suppliers in FY21.

Vicinity’s operations are solely based in Australia, and the majority of our direct (Tier 1) suppliers are also based in Australia. In FY21, we identified 55 direct suppliers based overseas. These suppliers came from 16 different countries, with the majority in the IT, consulting, and financial services industries.

We also recognise that some of our direct suppliers have operations, or engage subcontractors (Tier 2 and beyond), in foreign countries, which operate under different governance and legislative systems to protect labour and human rights.

We classify our supply chain into four spend areas: major projects, strategic, functional and transactional. This supplier classification considers the level of impact that the product and/or service has on our business with regards to guest experience, reputation, risk, cash flow (spend size), competitive advantage or regulatory compliance, and provides a framework for how we engage with and manage our suppliers.



BUSINESS AREA	EXAMPLES OF SPEND CATEGORIES	EXAMPLES OF SUPPLIERS ENGAGED
Operations	<ul style="list-style-type: none"> Facility services Utilities Repair & Maintenance 	Suppliers of facilities management services such as waste management, cleaning, security, mechanical, landscaping and maintenance, vertical transport and essential services such as energy, gas, heating and cooling, sewerage and water.
Developments and Refurbishments	<ul style="list-style-type: none"> Construction Consultants Safety and Compliance 	Head contractors, civil contractors, materials suppliers, design consultants and tradesman.
Corporate offices	<ul style="list-style-type: none"> Insurance Legal Services Marketing 	Suppliers of information and telecommunication services, professional service consultants, travel, accommodation, events and marketing.

GOVERNANCE AND POLICY

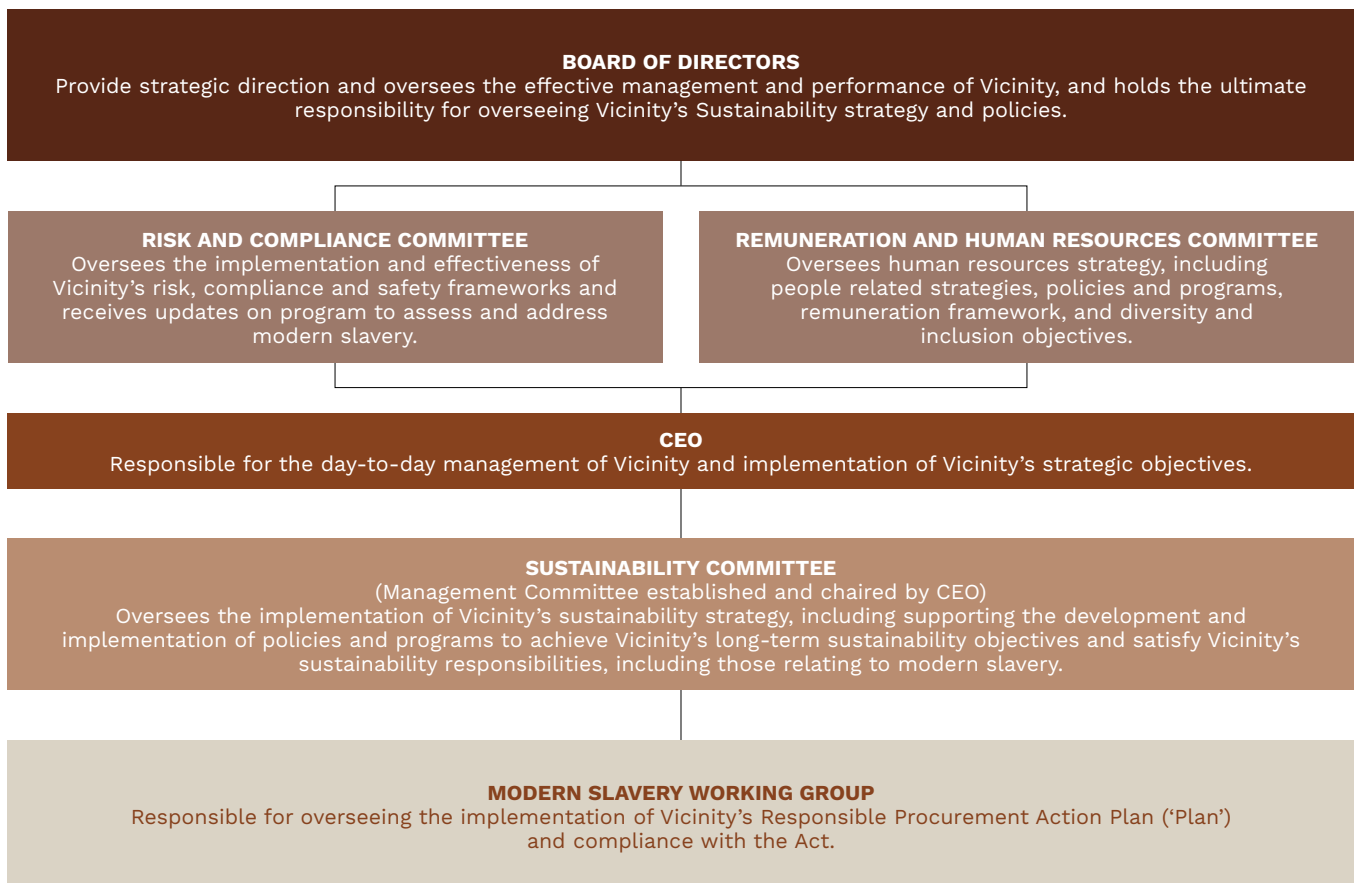
Vicinity’s approach to assessing and addressing modern slavery risk continues to be managed via the same governance structure for managing Vicinity’s material environmental, social and governance (ESG) risks and opportunities which is outlined in Figure 1 below. For further information on our corporate governance, refer to our **2021 Corporate Governance Statement**.

Vicinity’s Board holds the ultimate responsibility for overseeing our sustainability strategy and policies. The Risk and Compliance Committee (‘RCC’) of the Board oversees the implementation and effectiveness of Vicinity’s risk, compliance and safety frameworks and statutory disclosures. The RCC is provided updates on Vicinity’s program to assess and address modern slavery on a regular basis. Additionally, the Remuneration and Human Resources Committee of the Board oversees our people-related policies and strategies, including remuneration, diversity and inclusion programs.

The Sustainability Committee (‘Committee’), which forms part of our management committee structure, allocates responsibility for Vicinity’s sustainability agenda to the highest levels of the organisation. The Committee guides the direction of Vicinity’s sustainability programs and objectives, including those relating to modern slavery. It is chaired by our CEO and Managing Director, includes the Chief Information and Innovation Officer, Chief Operating Officer, Chief Development Officer, Chief Corporate Affairs Officer and a number of senior leader representatives, and meets on a quarterly basis.

Vicinity’s People and Organisational Development, Procurement, Risk, Legal, Compliance, and Sustainability teams are actively involved in driving our overall modern slavery response. This includes developing and implementing Vicinity’s modern slavery policies and practices across our direct workforce and supply chain. During FY21, Vicinity established and convened our first Modern Slavery Working Group (‘Working Group’). Chaired by our Chief Operating

FIGURE 1: VICINITY’S MODERN SLAVERY PROGRAM GOVERNANCE STRUCTURE



Officer, the Modern Slavery Working Group is Responsible for overseeing the implementation of Vicinity's Responsible Procurement Action Plan ('Plan') and compliance with the Act. The Working Group comprises representatives from Risk, Compliance, Procurement, Operations, Development, Legal, Security, People and Organisational Development and Sustainability.

Policies and controls

Vicinity has several policies in place relevant to modern slavery and human rights, all of which are approved by the Board or one of its committees. These include,

- Code of Conduct,
- Human Rights Policy,
- Sustainable Procurement Policy, and
- Whistleblower Policy.

The above governance structure and policies apply to all entities owned and controlled by the Group.

SUPPLIER CODE OF CONDUCT

In FY21, we updated our Vicinity Supplier Code of Conduct ('Code'), in order to incorporate our previous separate Sustainability Code of Practice into one overarching document. The Code outlines Vicinity's commitment to promoting responsible sourcing practices spanning from human rights, the environment and business ethics, across our organisation and suppliers. We expect our suppliers including their sub-contractors and all third parties in our suppliers' supply chain to share our commitment in acting fairly, ethically, safely and responsibly at all times. The Code forms an important component of Vicinity's procurement processes and agreements with our suppliers. As part of our supplier sustainability questionnaire, vendors are required to attest that they comply with the Code and must report any deviations from the Code.

Modern slavery risks in our operations and supply chain

We understand that human rights and modern slavery due diligence is an ongoing process of continuous improvement. Vicinity has had in place mechanisms to assess and address ESG risks in our supply chain for some time, however during the current reporting period we have continued to broaden our assessment of our supply chain risks and reviewed our existing management practices in order to systematically integrate modern slavery and broader sustainability considerations into management of our supply chain.

In FY21 our focus was on evolving our own modern slavery risk management measures across our operations and supply chain, identifying emerging new risks and training our team members. We continue to commit to implementing a meaningful and phased response, that puts in place the long-term foundations to create positive outcomes for both our business and the people in our supply chain.

MODERN SLAVERY RISKS IN OUR DIRECT WORKFORCE

During the reporting period, we once again considered the risks of modern slavery practices within our direct operations and workforce as low. Our employees are primarily working in professional services exclusively within Australia where employee-employer relations are strictly regulated by the Fair Work Act 2009 and relevant modern awards.

Modern slavery risks that relate to our operations and direct workforce are assessed in the context of our health and safety and human resources policies and practices, ethical standards and behavioural conduct requirements as per our Code of Conduct, and legal and contractual obligations such as employment conditions. We maintain robust internal policies, systems and processes to comply with our legal and contractual obligations and to manage entitlements relating to our people.



Our People and Organisational Development team continues to drive the various programs as described in our FY20 Modern Slavery Statement (First Statement). Vicinity's employees are compensated above Australian minimum wage, provided leave entitlements in excess of minimum legal requirements, and are free to join or establish trade unions or other associations and take part in collective bargaining processes, where applicable.

Additionally, we understand that it is important that our team members have a strong understanding of modern slavery including how to raise concerns about modern slavery risks. In FY21, we delivered modern slavery training and refresher training in relation to whistle blowing as part of our annual compliance training program for all staff to provide them with tools on how to recognise and report modern slavery concerns.

In FY22, we aim to provide even more targeted training for staff directly involved in procurement and for our centre teams.

These programs collectively help to create a workplace that supports our people professionally and personally, and minimises the risk of modern slavery practices. More about our safety, health and wellbeing programs can be found at sustainability.vicinity.com.au.

MODERN SLAVERY RISK IN OUR SUPPLY CHAIN

We continue to consider the risks of modern slavery practices to be higher in our supply chain than our direct workforce. We also understand that identifying modern slavery risks in a supply chain is complex and needs to extend beyond first-tier suppliers.

In FY21, Vicinity engaged an independent expert consultant to complete a comprehensive risk assessment of our supply chain, including our corporate, centre and development suppliers, to identify any potential human rights and modern slavery risks. The risk assessment was completed on 799 of our suppliers. Due to timing of the engagement with the independent expert consultant towards the end of the FY21 reporting period and due to time constraints, we prioritised the completion of a risk assessment across our highest spend suppliers. Our intention is to undertake a detailed risk assessment in relation to all outstanding suppliers within the next reporting period.

The risk assessment process consisted of mapping and tracing economic inputs required to produce products and services sourced from our Tier 1 to Tier 2 suppliers, all the way through to Tier 10 suppliers within our supply chain. This risk assessment has provided a holistic review across each business unit, while also offering a basis for potential individual actions for specific suppliers identified (or suppliers falling within industry categories).

This assessment incorporates a complex interaction of factors that can impact risks within supply chains, including:

- anonymised company spend data throughout global markets;
- anonymised total spend amounts for individual suppliers (i.e. the value of our direct supplier contracts);
- geographical area of operation;
- industry categorisation, including industries with substantive inputs from other industry categories further down the supply chain; and
- relative depth of tiering within the supply chain(s) e.g., 3rd tier supplier, 5th tier supplier, etc.

The supplier risk assessment was mapped according to country and industry ratings and was used to better understand and map our higher risk suppliers in conjunction with the category level risk assessment that was completed in FY18. This risk assessment did not identify any actual or suspected incidences of modern slavery within our operations or supply chain.

The assessment has identified that our highest risk areas through which Vicinity could be directly or indirectly linked to potential modern slavery practices continue to be:

- Building contractors and materials suppliers for our development projects,
- Critical suppliers for our shopping centre operations and maintenance, such as cleaning and security,
- Suppliers of promotional goods and giveaways, and
- IT hardware and software for our corporate offices and centres.

The assessment has also flagged other areas of risk, not previously identified in our FY20 reporting period, being:

- Utilities including electricity and water supply,
- Market research and other business management services,
- Air conditioning, and
- Waste and sanitary disposal.

The supply chains for the above industry categories have been identified as having a more elevated risk of modern slavery because of factors that are not necessarily related to the end products or services that are being provided. It is more indicative of them being more remote parts of our supply chains, and that relatively elevated factors are identified at Tier 3 and even more so in further remote tiers.

Relative expenditure is also another significant factor that contributes to certain industries being flagged as higher risk. While a particular industry category may not be associated with a country that has inherent modern slavery risk, a high overall spend will result in a heightened risk profile. However, in considering our remediation and due diligence, we also recognise that the greater our overall spend is within a certain industry, the greater the potential influence we may have to leverage awareness and create impactful action in this area.

Vicinity is aware that certain industry specific factors also contribute towards elevated risks of labour exploitation and modern slavery practices in the above high risk areas, particularly in relation to our development suppliers. These remain the same as in FY20 and include;

- demand for low-skilled and manual labour, including migrant workers,
- the use of third-party recruitment/labour hire agencies and complex subcontracting arrangements,
- long and complex supply chains for manufactured products and raw materials that stretch across high risk countries for modern slavery practices, and
- poor visibility over indirect suppliers (Tier 2 and beyond).

In our FY20 Statement, we detailed an intention to seek further information from our high risk suppliers and address these risks through our Plan. Vicinity remains focussed upon the process of obtaining outstanding supplier information and completing the risk assessment on all remaining suppliers. We will prioritise completing this assessment in FY22 and undertaking further analysis and due diligence on our high risk suppliers and address modern slavery risks as required.

CASE STUDY

MODERN SLAVERY RISK IN GLOBAL SOLAR ENERGY SUPPLY CHAIN

In May 2021, Professor Laura T Murphy and Nyrola Elimã of Sheffield Hallam University published a paper ('Solar Report') examining Uyghur forced labour and global solar supply chains. This is largely due to the manufacture of solar-grade polysilicon in the region which makes up 45% of global market share for this material.¹

In 2018, Vicinity announced its long-term carbon target, Net Zero carbon emissions by 2030 for our 100 per cent owned retail assets (common mall areas) and our \$73 million investment in solar through the Integrated Energy Strategy. While solar remains a key component of our efforts to reduce our carbon emissions, Vicinity has identified that the procurement of renewable technology is considered a high risk industry for modern slavery due to risks present throughout the supply chain, from sourcing raw materials such as cobalt, to the manufacturing of batteries and solar panels. Vicinity became aware of the findings of the Solar Report towards the end of the reporting period.

Since the commencement of our solar program rollout, significant efforts have been made to engage directly with major component suppliers to validate technical, commercial and sustainability credentials including supplier factory visits completed in 2018. In FY21 we commenced further due diligence of our suppliers in response to the Solar Report.

During FY22 we intend to develop a more comprehensive response to the findings of the Solar Report, including a more comprehensive assessment of our solar supply chain, to determine whether there are any possible inputs or linkages to solar manufacturing entities listed on the U.S. Department of Labor's List of Goods Produced By Forced and/or Child Labour, and any further solar manufacturing companies that have recently been associated with restrictions on silica-based material imports by the U.S. Department of Commerce. Vicinity is committed to ongoing monitoring of the solar manufacturing landscape, given the growing global concerns about the proliferation of solar inputs tainted by Uyghur forced labour.

¹ Murphy, L. and Elimã, N. (2021). "In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains." Sheffield, UK: Sheffield Hallam University Helena Kennedy Centre for International Justice.

Assessing and addressing modern slavery risks

EMBEDDING CONSIDERATION OF MODERN SLAVERY IN SUPPLY CHAIN MANAGEMENT

Since our First Statement, Vicinity has continued to establish strong foundations to embed the consideration of modern slavery risks into our procurement processes.

The mechanisms to assess and address modern slavery risk in our supply chain include:

- a supplier sustainability assessment to review ESG practices of prospective suppliers as part of our sourcing process, with high sustainability risk suppliers evaluated against additional specific criteria,
- inclusion of clauses in maintenance service agreements (including cleaning and security contracts) relating to subcontracting practices, supplier audits, and requirement to comply with Fair Work Australia regulations,
- Vicinity's procurement team engaging with strategic operational suppliers via regular contract management meetings to discuss and monitor compliance with contractual obligations, and an annual routine audit program of cleaning and security suppliers through an independent workplace relations specialist organisation.

These measures have primarily been implemented across strategic operational spend categories such as waste, cleaning and security services. In FY21, we continued to progress building an awareness of modern slavery risks that can occur within our high risk categories, particularly with respect to our development projects. We integrated modern slavery reporting requirements for all Vicinity principal contractors within Principal Project Requirements (PPR) and additionally implemented that the Project Control Group (PCG) monthly reports that principal contractors provide to Vicinity provide confirmation of no deviation from their modern slavery program.

Our Plan continues to be the framework which identifies and prioritises our key initiatives to ensure we are appropriately managing our ESG risks, including modern slavery in our supply chain.

A number of actions were taken during FY21 to support our modern slavery approach, which included:

- Delivered modern slavery training and refresher training in relation to whistle blowing as part of our annual compliance training program for all staff to provide them with tools on how to recognise and report modern slavery concerns,
- Engagement of independent expert to complete a materials deep dive on one of our development projects in order to develop a deeper understanding of our supply chain and associated modern slavery risks present within construction materials. This report reviewed the highest risk suppliers associated with this project, together with the supply chain inputs for common product types relied on, such as:
 - electrical wiring components, such as coal, copper, aluminium, iron, resin, PVC, circuit breakers, motors, batteries
 - renewable energy products, such as quartz and polysilicon
 - construction materials, such as concrete, steel, cladding, metallic products, bricks, electrical equipment, rubber, glass
 - technological and electronic hardware,
- Commenced internal consultation on our Remediation Framework to guide 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,
- Becoming a participant to the United Nations Global Compact (UNGC) furthering our public commitment to respecting and supporting human rights in line with international standards,
- Collaborated with our peers in order to strengthen our modern slavery response. This included our continued participation in an industry response through the Property Council of Australia's Modern Slavery Working Group, participation on the Cleaning Accountability Framework Modern Slavery Working Group and the UNGC Network Australia Modern Slavery Community of Practice.

CASE STUDY

CLEANING ACCOUNTABILITY FRAMEWORK PILOT

The Cleaning Accountability Framework (CAF) is an initiative seeking to improve labour standards in the cleaning industry in Australia. The CAF's approach to assessing and addressing modern slavery risks through building certification is based on the promotion of decent work, ongoing human rights due diligence, a recognition of the limits of social auditing and the elevation of worker voices. With high numbers of vulnerable employees who may not be able to advocate for their rights, cleaning can be an area of risk for illegal and unethical labour practices.

The CAF sets standards for wages and labour conditions, tax and super, and responsible contracting which are independently audited to verify these criteria are being met for cleaning services at a specific location. CAF audits compliance within both the contracting company and the cleaning services provider, ensuring both entities are accountable for the standards being met.

Vicinity was one of the first retail property companies to participate in CAF's pilot program. We are proud that in 2019 our Northland Shopping Centre (Vic), in collaboration with our incumbent cleaning services provider, achieved the 3 Star Standard certification.

We continue to maintain this certification over the three-year period with six monthly compliance checks and annual detailed audits including: fair work conditions, payslip and timesheet checks, worker health and safety, induction and training and employee checks.

We continue to participate in CAF and are evaluating the potential for CAF's new portfolio certification in FY22 to further improve the labour standards in the cleaning supply chain of our other centres.



96%

OF EMPLOYEES COMPLETED
TRAINING ON HUMAN RIGHTS
AND MODERN SLAVERY
ISSUES IN FY21

ASSESSING AND ADDRESSING MODERN SLAVERY THROUGH INDUSTRY COLLABORATION

In FY21, we continued to participate in the Property Council of Australia's ('PCA') modern slavery program of work which has been designed to address this complex and challenging issue.

Vicinity has been an active member of the PCA's Modern Slavery Working Group and contributed towards the development of a platform designed to engage suppliers across the real estate sector via a common modern slavery questionnaire.

As detailed in our First Statement, Vicinity has incorporated the PCA modern slavery questionnaire into our supplier due diligence assessment framework. Through the PCA platform we have now increased the participation of high risk, business critical procurement suppliers to 31, which represents an additional 13 high risk suppliers engaged during the FY21 reporting period. All suppliers are required to complete self-assessment questionnaires within the PCA platform and are strongly encouraged to provide details of their modern slavery related risk assessment and due diligence measures.

Vicinity has and will continue to assess the evidence provided by these high risk suppliers to further inform our broader supplier engagement efforts and we continue to monitor the progress and changes in supplier responses over the subsequent reporting periods to determine whether any targeted action is required.

Our assessment of suppliers engaged via the PCA platform was enhanced during the FY21 reporting period, through a collaboration of the PCA, Informed 365 and Bureau Veritas, which introduced independent third party reviews of the assessment responses provided by suppliers. These independent third-party reviews will assist Vicinity in the future by identifying strengths and weaknesses in supplier responses, and providing material for capacity building activities for our suppliers.

During FY22, Vicinity will invite additional high and medium risk suppliers to respond to the modern slavery questionnaire on the PCA platform in order to broaden our risk assessment and supplier engagement.



CONTINUING TO WORK WITH OUR SUPPLY CHAINS TO MANAGE CONTINUED COVID-19 MODERN SLAVERY RISK

During the ongoing COVID-19 pandemic, our centres have continued to remain open for customers to access essential goods and services. Our primary focus during this time has been to ensure the health, safety and wellbeing of our employees, customers, tenants, contractors and broader communities.

During FY21 we continued working closely with our cleaning suppliers to repurpose labour during lockdowns. This included utilising cleaning labour to carry out deep cleans of our centres and implement additional touch point cleaning with a focus on areas of the centres that were open to the public.

We introduced these repurposed labour measures in an effort to prevent compounding the vulnerabilities of low skilled workers through loss of employment, which may further exacerbate their risk of exploitation. We continue to monitor any changes occurring in our operations and supply chains as a result of continued COVID-19 disruptions that may affect our modern slavery risk exposure.

INCIDENTS AND REMEDIATION PROCESSES

Whistleblower policy

Vicinity's Whistleblower Policy enables eligible people (which includes Vicinity employees, associates, as well as employees of current and former suppliers and tenants) to raise concerns about any unlawful, unethical, irresponsible or undesirable conduct involving Vicinity without fear of reprisal. Grievances can be reported directly to an internal Whistleblower Officer, or through an independently monitored external whistleblower service. Reported grievances are investigated where appropriate, escalated, reported, and appropriate action is taken in line with this policy. All Vicinity employees receive training on our whistleblower policy as part of our annual compliance training program. To enhance awareness of the policy among workers in our supply chain, we have also designed and displayed signage in back-of-house areas at all centres.

Incidents

During the FY21 reporting period, we were made aware of seven total grievances and investigated six with one grievance pending investigation which were raised with us by staff engaged by our contractors. These grievances were raised with us either directly or via our online whistleblower service. None of these grievances were identified as incidences of modern slavery. Following investigation of each grievance and where we identify non-compliance with requirements under our contractual arrangements, our approach is to collaborate with the supplier to address the non-compliance and deliver an outcome for the employee. If a supplier is reluctant to comply or does not cooperate, we will no longer engage that supplier. To give an example, one of the investigations we initiated this year resulted in back payments for 31 employees across five centres in two states.

Additionally, we worked with our cleaning and security contractors to review their own whistleblower processes and to raise awareness of this service with their staff as an additional means by which they could raise concerns if they were comfortable to do so. This also included communicating that Vicinity's own whistleblower channels remained available to them.

Furthermore, we developed our Remediation Framework in FY21 and have consulted internally with stakeholders in readiness for rollout of this framework during FY22. In line with the UN Guiding Principles on Business and Human Rights, the Remediation Framework aims to protect the health and safety of workers in both our direct operations and supply chain. In all instances, our priority will be to ensure the safety of the individual(s) experiencing any adverse impact, and cooperate with the appropriate stakeholders, including law enforcement, to prevent or mitigate harm and its recurrence.

We will continue to review the scope and operation of the current grievance mechanism to ensure it remains accessible to our most vulnerable workers and supply chain employees.



Assessing effectiveness of our actions

We acknowledge that modern slavery due diligence is an ongoing process of continuous improvement. In our First Statement, we set out our intention to prioritise creating a framework to review our modern slavery response over subsequent reporting periods.

In FY21, we developed a Modern Slavery Monitoring and Evaluation Program which has established clear accountabilities, performance metrics and reporting lines, to assess and report on progress and effectiveness of our actions throughout the year. We have continued to employ a number of processes to monitor the effectiveness of our actions to address modern slavery risk.

These include, but are not limited to:

CATEGORY

HOW WE ASSESS EFFECTIVENESS

GOVERNANCE



We provide regular updates to the Vicinity Modern Slavery Working Group, the RCC and Sustainability Committee on our internal framework, including policies and programs that address modern slavery.

RISK ASSESSMENT AND MANAGEMENT



We utilise a number of methods to assess the effectiveness of our risk assessment and management processes. These activities include but are not limited to,

- engaging external subject matter experts to undertake a comprehensive risk assessment and supply chain mapping of suppliers,
- conducting independent audits of employee shared services (including performance and reward functions) to ensure compliance with legislative and contractual obligations,
- reviewing supplier responses to Vicinity's supplier sustainability assessment during the sourcing process and requesting additional information on policies and practices where necessary,
- continued and expanded supplier engagement through the PCA platform, including reviewing and validating supplier responses to the modern slavery questionnaire,
- regularly engaging with our strategic operational suppliers via contract management meetings,
- engaging independent external workplace relations expert to undertake regular auditing of our suppliers in high risk industries, such as cleaning. These external experts also continue to monitor corrective action plans.

INCIDENT REPORTING



Incidents raised and investigated through whistleblowing channels are reported to the RCC.

COLLABORATION



Continued to collaborate with industry partners through active involvement in the PCA Modern Slavery Working Group, CAF Modern Slavery Working Group and UNGC Australia Modern Slavery Community of Practice to share learnings and approaches.

Next steps

We are committed to the continuous improvement of our response to modern slavery risks. In conjunction with the Plan, our FY22 priorities include:

- Roll out targeted and more detailed training for all procurement and centre based staff to provide enhanced education on how to identify areas of modern slavery risk,
- Facilitate an enhanced modern slavery training session for Vicinity's Board and EC,
- Roll out the Vicinity Remediation Framework and launch internal Vicinity Modern Slavery Guidelines which will outline the reporting and remediation process in more detail for all employees,
- Build on our risk assessment and update our risk matrix and response criteria to further embed within other areas of our business,
- Extend the scope of our modern slavery risk assessment to include Tier 2 suppliers (i.e. entities who are suppliers to our Tier 1 suppliers) that provide services involving subcontracting or labour hire, or products sourced from locations or industries that have been identified as high risk,
- Continue to engage with our suppliers and contractors on raising awareness around modern slavery risks.

Consultation With Controlled Entities

During the subject reporting period, we have engaged in a full process of joint consultation in the preparation of this Statement, and in relation to our modern slavery response generally. All risk assessment, due diligence, and remediation measures described in this Statement have equal application across both mandatory reporting entities. We have engaged representatives from all reporting entities in our working group, to ensure our modern slavery response is inclusive of all aspects and operation of the Vicinity Group.

All necessary consultation and engagement with all owned and controlled entities, as listed in the 'Information About Our Modern Slavery Statement' have occurred in relation to the modern slavery response as detailed in this Statement.

Contact us

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