



modern slavery statement.

For the year ended 30 June 2022

About this modern slavery statement.

Growthpoint provides space for our tenants and their businesses to thrive. Bringing this purpose to life means delivering better outcomes for all our stakeholders. For everyone we engage with, including our employees, contractors and suppliers, we are committed to respecting human rights and maintaining safe working environments. We do not tolerate non-compliance with modern slavery laws.

Modern slavery is a global issue, and we understand our responsibility to prevent, mitigate and remediate incidents of modern slavery in our operations and our supply chain. We recognise the need for ongoing improvement and continued action to mitigate the risks of modern slavery and are focused on transparent reporting of our approach and actions to comply with the *Modern Slavery Act 2018 (Cth) (Act)*.

This is the third 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 2022 (FY22 or the reporting period), pursuant to section 16 of the Act.

This modern slavery statement was approved by the Company on behalf of itself and as responsible entity for the Trust on 16 November 2022.

Timothy Collyer
Managing Director
Growthpoint Properties Australia

16 November 2022



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 FY22 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 below the 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	3-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	8-9
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	10-14
Describe how the reporting entity assesses the effectiveness of these actions	15-16
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	17
Any other information that the reporting entity considers relevant	17

Key highlights in FY22.



Supply chain data analytics risk assessment

Engaged an independent specialist modern slavery consultant to undertake a data analytics risk assessment of our supply chain to identify the highest risk sectors and suppliers



Remediation framework

Developed a modern slavery remediation framework to guide our responses to any reported instances of modern slavery



Solar panel procurement risk management

Introduced a tailored modern slavery questionnaire to screen solar panel providers as part of the procurement of solar panels and established a list of pre-qualified suppliers to deliver solar projects



Board training

Provided customised training to the Company's Board on modern slavery risks and reporting

Our structure and operations.

As at 30 June 2022³



About Growthpoint

Growthpoint Properties Australia (ASX: GOZ) is a real estate investment trust (REIT), listed on the ASX, and is part of the S&P/ASX 200 Index. For more than 13 years, we’ve been investing in high-quality industrial and office properties in Australia to provide spaces for businesses to thrive.

As at 30 June 2022, we directly owned and managed 58 high quality properties across Australia, valued at approximately \$5.1 billion. We actively manage our portfolio and invest in our existing properties, ensuring they meet our tenants’ business needs now and into the future.

We are committed to operating in a sustainable way. We believe by making our business more sustainable and being a positive contributor in the communities in which we operate we can achieve our primary objective of providing our Securityholders with sustainably growing income returns and long-term capital appreciation.

Our values underpin everything we do as a business.



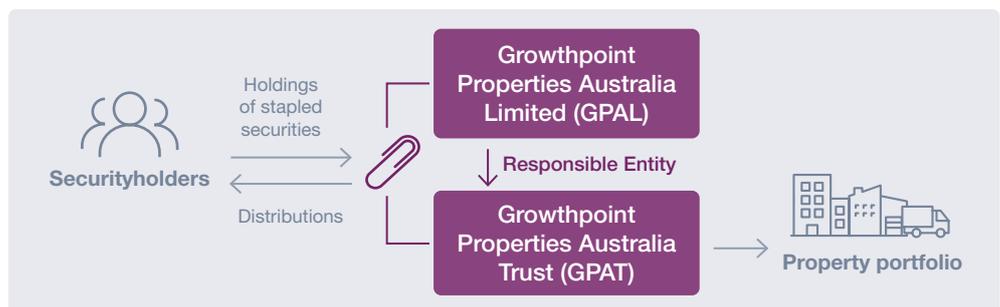
Our operations

Growthpoint’s business operations for FY22 included 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 in the office and industrial sectors. The majority of Growthpoint’s earnings during the reporting period was received from rental income from our tenants with ancillary income from investment dividends and interest revenue.

Our corporate structure

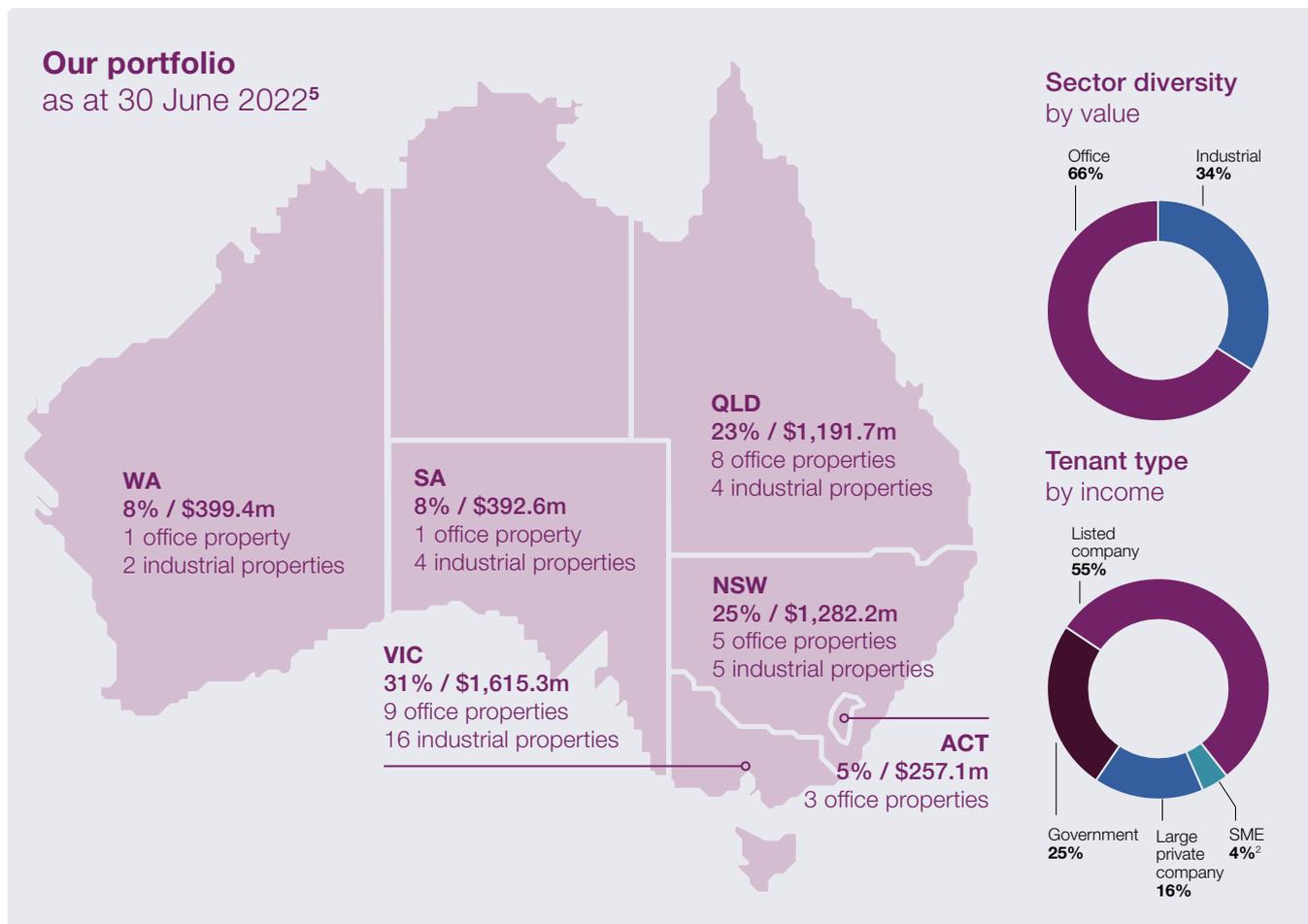
Growthpoint and its controlled entities are domiciled in Australia and our operations are subject to Australian laws. Growthpoint has an internalised management, governance and reporting structure for the Company and Trust. The reporting entity under this statement is Growthpoint, however due to our 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 Growthpoint’s controlled entities for FY22 is provided on page 93 of our [FY22 Annual Report](#). Further information about our business is also provided in that report.



3. Excludes GSO Dandenong, 165-169 Thomas Street, Dandenong, Victoria which settled in July 2022.
 4. Includes full-time, part-time and casual employees. Excludes employees on contract.

Our operations.



Our direct workforce

As at 30 June 2022, Growthpoint directly employed a team of 41 employees, comprised of 37 full-time, two part-time and two casual employees, to support our business operations. Employees provide professional services across asset management, valuations, legal, compliance, risk, finance, human resources, projects and sustainability and corporate functions.

Our head office is located in Melbourne, which the majority of employees work from, with offices in Sydney and Brisbane.

Further information about our permanent workforce is available on pages 38-41 of our [FY22 Sustainability Report](#).

Subsequent event – acquisition of Fortius Funds Management

Growthpoint announced on 15 September 2022 that it had completed the acquisition of 100% of the shares in Fortius Funds Management Pty Ltd (Fortius). Fortius is a real estate funds management business that currently manages funds that invest in office, retail and mixed use properties and debt investments across value add and opportunistic strategies. As we progress through FY23, we intend to conduct modern slavery awareness training for these new employees, review any existing modern slavery related targets and initiatives, and bring the funds management business within the Group’s modern slavery practices. Details of the implementation of these activities will be outlined in the FY23 Modern Slavery Statement.

5. Excludes GSO Dandenong, 165-169 Thomas Street, Dandenong, Victoria which settled in July 2022.

Our supply chain.

Growthpoint's business operations and investments are based wholly within Australia. During FY22, Growthpoint partnered with approximately 950 suppliers, either directly or through its external property managers, which collectively provided goods and services across the following three key areas: asset management, development and projects and corporate operations.

Our suppliers are of various sizes and span a range of industries, including construction, property agency, engineering, cleaning and information technology. While most of our suppliers are based in Australia, many have complex and diverse supply chains that extend globally.

FY22 top five spend categories for external suppliers

The table below shows our top five spend categories for FY22 (excluding statutory rates and taxation, employee salaries and utilities).

Spend category	Spend description	% spend
Development and projects	Capital works (e.g., building and construction, tenant fit-outs, and plant and equipment upgrades)	52%
Asset Management	Property management related consultants (e.g., property agents, engineering, architects and valuers)	20%
	Property maintenance related services (e.g., electricians, waste and recycling, lifts and elevators and garden maintenance)	19%
	Cleaning and security	5%
Corporate operations	Other (e.g., catering, insurance, legal consultants, couriers and photography)	4%

Asset management

Asset management is an integral part of Growthpoint's supply chain. We continue to utilise two external multinational property management companies, JLL and CBRE, 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 published annual modern slavery statements to Growthpoint for review and consideration when planning our program of activities.

Development and projects

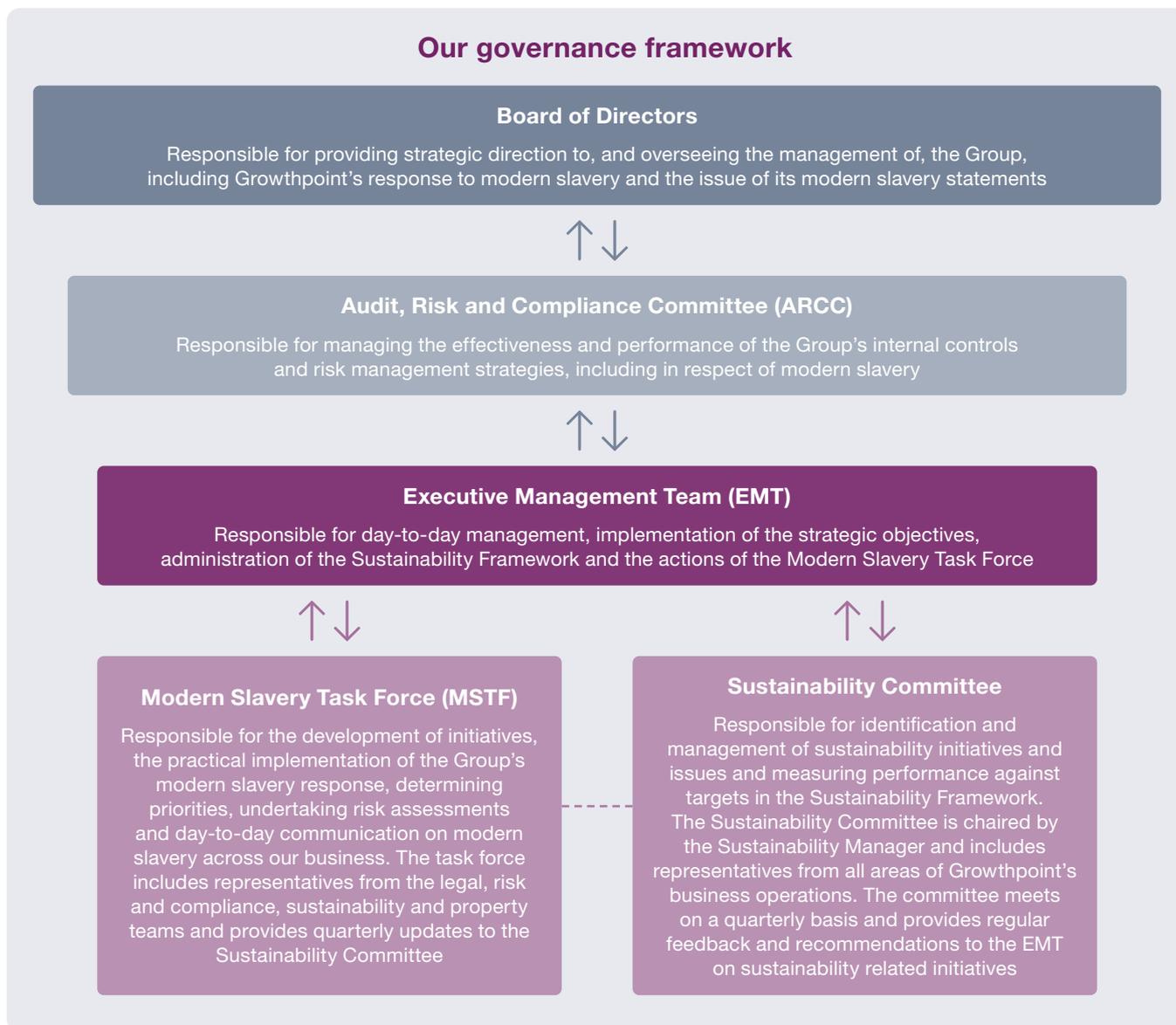
Growthpoint directly engages contractors, suppliers and consultants in connection with the development of our assets, refurbishment works, fit-out projects, onsite solar installations and large capital expenditure projects. These suppliers cover the full development process and include design, construction, planning and project management. We generally only engage Australian-based construction companies as a direct contractor. 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 (EMT).

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

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 ARCC, which has oversight of the Group’s compliance and risk management framework, which includes modern slavery risks.

Our EMT is responsible for the day-to-day management and administration of the Group’s Sustainability Framework and the actions of the MSTF. The Sustainability Committee guides the sustainability programs and objectives of Growthpoint at an operational level. It is chaired by our Sustainability Manager and members include the Chief Operating Officer, Chief Investment Officer, Chief Financial Officer and Head of Projects & Sustainability.

The MSTF is an internal working group which consists of representatives from the risk and compliance, legal, asset management and sustainability teams. It provides regular updates to the Sustainability Committee and EMT in respect of the development and implementation of Growthpoint’s

Our governance and policies.

modern slavery practices and initiatives and performance against modern slavery mitigation targets. The MSTF is the point of contact within the business for modern slavery queries on procurement.

Growthpoint's commitment to responsible work practices is underpinned by various internal policies including the Growthpoint Code of Conduct, Sustainability Policy, 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, periodic reviews and subsequent updates on changes to policies are communicated to employees. All policies are centrally located on Growthpoint's internal file sharing system and key policies are available to download from our website. The ARCC will be informed of any non-minor breaches of relevant policies and any breaches ranked 'high' will be reported to the Board and external auditors.

In addition to the above policies, during the reporting period, Growthpoint introduced a new Sustainability Framework consisting of 20 measurable targets as an evolution of our sustainability program, including two targets specifically focused on modern slavery risks. The Sustainability

Framework will ensure that we continue to direct attention on activities and initiatives that can drive the greatest benefit for Growthpoint and our stakeholders. The Sustainability Framework is disclosed on pages 9-10 of our [FY22 Sustainability Report](#).

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 also require our suppliers to provide the Supply Chain Sustainability Guidelines to all their employees who are providing services to Growthpoint.

Risks of modern slavery practices in our operations and supply chain.

Growthpoint is aware that 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. 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 high risk services or raw materials.

Risks in our corporate operations

Growthpoint's employees comprised a team of 41 skilled professionals⁶ working exclusively within Australia as at the end of the reporting period. 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 modern awards.

Accordingly, we consider our business operations to be at low risk for forced labour or unpaid work, debt bondage, human trafficking or other risks to our direct employees that may cause modern slavery practices.

Risks in our supply chain

Growthpoint's supply chain comprises a diverse range of suppliers, contractors and other service providers providing products and professional services in connection with our corporate operations, asset management function, and developments and projects.

As identified in our first **modern slavery statement**, our highest potential risk of exposure to modern slavery practices continues to be the procurement of operational maintenance services by our external property managers as part of the day-to-day management of our properties. Growthpoint is directly linked to this risk as these services are procured on our behalf.

This risk was determined based on the underlying industry specific risks associated with the procurement of operational maintenance contractors that provide cleaning, landscaping, maintenance and security services. We are aware that these types of operational services are associated with basic-skill labour that are often on low pay and that employees of contractors may be employed on a casual or temporary basis. These operational maintenance workers may also be from vulnerable demographics, including from migrant, low socioeconomic, or culturally and linguistically diverse backgrounds, which may mean that workers may be unaware of their rights and less likely to self-report. The risks associated with operational maintenance contractors are inherent to the property industry and need to be proactively monitored and managed.



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:⁷

- **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.

Supply chain risk assessment

Our **second modern slavery statement** disclosed additional high-risk areas within our supply chain within the construction and labour, information technology and corporate operations industries. As an extension of previous internal modern slavery risk assessments, during the reporting period, Growthpoint engaged an independent specialist modern slavery consultant, Fair Supply, to undertake a detailed data analytics assessment of Growthpoint's supply chain. This exercise provided Growthpoint with a more fulsome understanding of the high risk industries that the Group is exposed to and resulted in a broader review of the potential modern slavery risks across the supply chain.

This risk assessment was undertaken on the monetary spend on 638 suppliers engaged by the Group in FY21.⁸ We are aware that identifying modern slavery risks in our supply chain, in particular in the property industry, is complex and needs to extend beyond first-tier suppliers. Through the investment and geographic data of Fair Supply, Growthpoint could trace the economic inputs required to produce products and services used within our supply chain from our Tier 1 direct suppliers, all the way down to Tier 10 suppliers.

The risk assessment provided an indication of the industries that have a higher risk exposure to modern slavery with the outcome assessed on a theoretical 'slaves per million dollars' spend metric based on country and industry ratings. To determine this, the assessment undertaken by Fair Supply incorporated a number of complex factors that can impact a company's supply chain, including geographical location of operation, industry categorisation and depth of the supply chain.

Based on the risk assessment, Growthpoint's Tier 1 suppliers present a low risk of modern slavery practices. This is predominately due to the majority of our Tier 1 suppliers being based in Australia. This conclusion aligns with our business model of procuring external service providers for property

6. Includes full-time, part-time and casual employees. Excludes employees on contract.

7. Guiding Principles on Business and Human Rights – Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011.

8. Excludes spending by the Group on tenant incentives or to head lessors where a Group entity is tenant.

Identifying risks of modern slavery practices.

management, development and project management and some corporate operations.

The risk assessment through Fair Supply identified that the majority of Growthpoint’s modern slavery risks exist within Tier 2 and Tier 3 suppliers, where Growthpoint could be directly or indirectly linked to potential modern slavery practices. The assessment confirmed that Growthpoint’s potential exposure to modern slavery continues to be from high-risk industries such as:

- > Construction and labour services (identified as non-residential construction): this includes construction and labour services undertaken by building contractors and raw material suppliers;
- > Subcontractors of construction companies (identified as non-building construction): this includes suppliers such as concreters, roofers, plumbers, electricians and fire inspectors; and
- > Operational property services: this includes day to day property management, maintenance and operations at our properties.

The above conclusions from the Fair Supply data analytics risk assessment support Growthpoint’s internal risk assessments to date. The identified high-risk areas align to known risks, as large-scale capital expenditure projects and solar projects undertaken within the Group may involve permitted subcontracting and the procurement of raw materials from high risk industries.

In addition, the risk assessment has also indicated two other high-risk industries based on data spend and categorisation of risk not previously identified by Growthpoint as high risk, being:

- > Air conditioning; and
- > Lifts and escalators.

We consider the key risks associated with the air conditioning, lifts and escalators industries are not necessarily related to the end products or services that are being provided at our properties, but arise from the importation of products, component parts or raw materials sourced from countries with a higher risk of labour exploitation that are present deeper in the supply chains.

For our next reporting period, we will look to engage with our air conditioning, lifts and elevators contractors to better understand the modern slavery risks that may exist within their supply chain and how these suppliers are managing and mitigating their potential risk exposure to modern slavery. In addition to this, we will continue to undertake further analysis and due diligence on our supply chain and prioritise resources and initiatives to these identified high-risk areas of potential modern slavery.

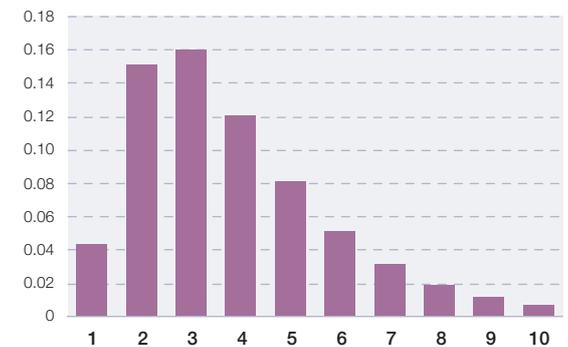
As this assessment is predominately determined based on monetary spend by Growthpoint and individual suppliers, we recognise that some limitations may apply and suppliers with whom Growthpoint has spent a low amount, may have a higher level of modern slavery footprint if the supply chain mapping technology deems the supplier to operate within a high-risk industry. Conversely, if the supplier spend is large and the industry is considered low risk based on the available data, this may result in a higher risk of modern slavery footprint.

This risk assessment did not identify any actual or suspected incidences of modern slavery within our operations or supply chain.

Modern slavery risks in Growthpoint's supply chain⁹

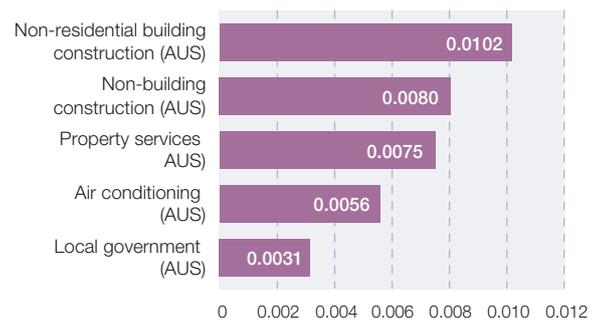
Risk by tier

(theoretical slaves / per \$m spent)



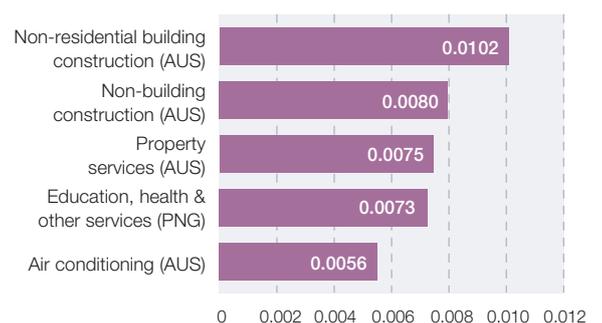
Risk by Industry - Tier 1

(theoretical slaves / per \$m spent)



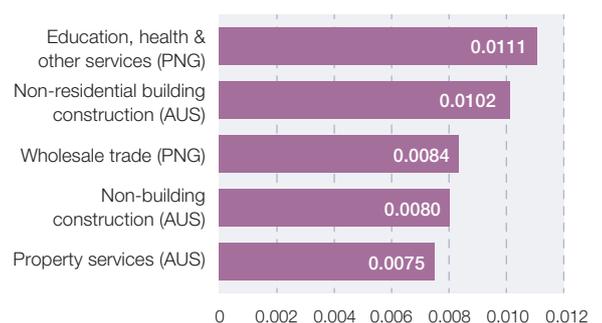
Risk by Industry - Tier 2

(theoretical slaves / per \$m spent)



Risk by Industry - Tier 3

(theoretical slaves / per \$m spent)



9. Source: Fair Supply research.

Our approach to assessing and addressing modern slavery risks.

Mitigating modern slavery risks in our corporate operations

We are committed to fostering a culture that reflects our values of respect, success, inclusion, integrity and fun to ensure that Growthpoint is a great place to work. We value the expertise and skills of our employees and actively seek to tailor an employee value proposition which includes competitive remuneration, enhancing core employee programs, attraction and retention offerings, professional development programs and inclusive social events. Our focus as an employer is to ensure that we are providing and maintaining a safe and healthy workplace for all our people.

Key activities and initiatives we undertake to manage and uphold high standards for Growthpoint's employees include:

- › basing all recruitment and promotions on merit, performance and capability, fair employment practices and benchmarking of salaries;
- › providing compulsory training for all employees on our Code of Conduct, modern slavery practices and workplace behaviour policies;
- › conducting programs to support physical and mental wellbeing, including training and appointing six employees from across the business as our inaugural Mental Health First Aid officers during the reporting period;
- › providing flexible workplace arrangements;
- › undertaking a yearly employee engagement and alignment survey to understand our employees' views on business operations; and
- › ensuring all new employees of Growthpoint receive individual training on our policies, including modern slavery awareness, as part of their induction.

More information about our approach to maintaining a healthy and safe workplace, our employee wellbeing and development, diversity and inclusion programs and our most recent employee engagement and alignment performance can be found on pages 21-23 of our [FY22 Sustainability Report](#).

During the reporting period, Growthpoint reviewed its employee benefits and introduced additional tenure-based paid leave (up to a maximum of five days) above the minimum legal requirement and introduced paid superannuation when employees are on unpaid parental leave (for the balance of the first year).

Mitigating modern slavery risks in our supply chain

Follow up: due diligence by external property managers on cleaning services

The MSTF has continued to engage 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 and operational maintenance services are critical to asset management and our business as a professional landlord.

Given 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, we sought clarification from our external property managers on their approach to the procurement of cleaning contractors.

Both external property managers have their own pre-qualification process, including completion of a modern slavery questionnaire and tailored due diligence processes for appointing cleaning contractors. As part of the tender process, our external property managers utilise their own compliance tool to interpret productivity rates and pricing models against the modern awards and overhead cost comparison to industry benchmarks. This process enables our external property managers to assess tender responses to determine if proposals are in line with expected standards, including consideration of modern slavery risks and whether resourcing is sufficient to ensure all works can be appropriately engaged in accordance with the Fair Work Act. Further, relevant external property and facility managers are provided training to identify modern slavery risks and our standard service agreements include rights to audit for modern slavery related practices.

We also worked with the external property managers to deliver a tailored two-page information sheet on modern slavery training materials, including links to e-learning modules published by the Australian Border Force, the Walk Free Foundation and Supply Chain Sustainability School, as well as links to Growthpoint's Whistleblower Policy and Supply Chain Sustainability Guidelines. The information sheet was distributed to all cleaners and security contractors engaged by our external property managers on our behalf.

Our approach to assessing and addressing to modern slavery risks.



Spotlight on: modern slavery risks in security services

The combination of high-risk business models and an industry that attracts base-skill vulnerable workers elevates the risk of modern slavery practices in the security industry. Additionally, the COVID-19 pandemic increased the demand for the security services sector due to the need for additional resources to provide security services to unoccupied buildings and the Australian government required assistance with enforcing measures including social isolation, lockdowns, and quarantine. Post the COVID-19 pandemic and subsequent easing to the isolation and quarantine mandates, the tourism, events and entertainment industry are in high demand, creating new demands for the security services sector. These factors and the restriction on migration in Australia during the COVID-19 pandemic has resulted in a significant demand for security services.

Growthpoint’s security services contractors are procured and managed on our behalf by our external property managers with direction on procurement provided, as required, by our internal asset managers. These service agreements contain contractual provisions which set out our expectation that contractors comply with all relevant modern slavery laws and our Supply Chain Sustainability Guidelines and also restrict subcontracting of services.

Given the heightened demand on security service providers, during the reporting year, Growthpoint engaged with our external property managers to issue:

- > our modern slavery questionnaire to all security contractors to develop a greater understanding of the approach and controls adopted by contractors to identify and mitigate modern slavery risks; and

- > our tailored information sheet on modern slavery training materials, including links to e-learning modules on addressing and mitigating modern slavery links, as well as links to Growthpoint’s Whistleblower Policy and Supply Chain Sustainability Guidelines.

All nine security services 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 and indicated that all our security service contractors are aware of the importance of identifying and preventing modern slavery within their business, with the majority undertaking internal modern slavery training, assessing modern slavery risks in their operations and having specific policies to mitigate modern slavery risks.

Security services due diligence snapshot:

- 100%** were considered to have a basic understanding of modern slavery
- 100%** had grievance mechanisms in place
- 100%** provided training on modern slavery risks
- 89%** assessed modern slavery risks in their operations
- 89%** had a policy relating to modern slavery or human rights abuse

Growthpoint will continue to work with our external property managers, our tenants and our security service contractors as we balance the need for services across the broader Australian economy post the COVID-19 pandemic.

Updated due diligence questionnaire

In FY22, we updated our modern slavery questionnaire, which screens suppliers on their procedures to identify and manage modern slavery risks, to include a specific question addressing whether suppliers are required to pay their employees in accordance with the Fair Work modern awards and to seek confirmation of the relevant award, including regular reviews for updates and changes. This update occurred as Growthpoint is aware that a number of our operational maintenance suppliers pay employees the minimum wage and must comply with conditions of employment in accordance with modern awards and these are subject to periodic reviews. Furthermore, in some instances, our external property managers review hourly rates paid to operational maintenance suppliers as part of pre-qualification checks.

Due diligence process for capital expenditure projects

During the year, our internal Projects and Sustainability team continued to implement the pre-engagement requirement that 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 contractors for capital works below this amount would usually fall within the operational maintenance requirements of our external property managers, rather than Growthpoint’s formal capital expenditure program, and therefore be subject to the process outlined above to address modern slavery risks.

Our approach to assessing and addressing to modern slavery risks.

As part of our due diligence process, Growthpoint's modern slavery questionnaire was usually included as part of the request for proposal and completed during this step of the procurement process. All responses were reviewed by the MSTF to ensure the relevant contractor has appropriate awareness of modern slavery risks in their operations and supply chains, and policies and measures in place relevant for the business. The MSTF maintains a register of all responses and ensures that the pre-qualification status for each contractor remains active.

Enhanced due diligence for solar panel providers

During the year, the MSTF engaged in substantial industry discussion regarding the procurement practices of solar panel providers. We are aware of the published modern slavery risks, predominately forced labour, in the mining and production of polysilicon in the Xinjiang Uyghur Autonomous Region of China (Xinjiang),¹⁰ where a significant portion of global polysilicon is produced. Given polysilicon producers operate in a high-risk geography and the limited ability for solar providers to undertake physical inspections of production facilities, there is limited transparency available on the labour practices of polysilicon extractors and producers.

The reliance of solar panel manufacturers on polysilicon potentially sourced from a high-risk geography gives rise to additional risks of modern slavery occurring at Tiers 2 to 3 (and beyond) of Growthpoint's solar panel supply chain. Considering this heightened risk, we developed additional due diligence questions for solar panel providers to complete prior to engagement. The focus of the questions is on supplier awareness of modern slavery risks in their supply chain of raw materials, the manufacturers and countries of origin of their panels, if any certification is available for their products, and any known additional measures to mitigate modern slavery risks. This due diligence process is applicable to every onsite solar installation Growthpoint manages and/or funds and is not subject to a project value threshold. Growthpoint has adopted this approach to ensure that the onboarding of pre-qualified solar panel suppliers remains up to date, notwithstanding the known risks within the solar panel industry.

Onsite solar will play an important role to achieve our 2025 net zero target. As we deliver our pipeline of solar projects across our portfolio, Growthpoint will continue to consider additional measures and tender requirements that can be adopted to mitigate modern slavery risks associated with the procurement of solar panels.

Our other modern slavery initiatives

Other mechanisms that Growthpoint has in place to assess and address modern slavery risks in our operations and supply chain include:

- › Board members completed a mandatory modern slavery training session run by an external law firm. The session focused on assisting directors to identify the key modern slavery risk areas relevant to Growthpoint and the property industry, and provided an overview of stakeholder expectations and reporting obligations under the Act;
- › modern slavery contractual provisions are included within our consultancy agreements and maintenance service agreements to reinforce our expectation that suppliers and consultants comply with all relevant modern slavery laws and our Supply Chain Sustainability Guidelines. These contractual clauses also require suppliers and consultants to notify Growthpoint if they become aware that they, or any of their subsidiaries, subcontractors or suppliers, have engaged in modern slavery practices;
- › key service providers in relation to the operation of the Trust (excluding our external property managers) are required to provide their modern slavery statements to the MSTF for Growthpoint's records as part of their annual service provider performance review;
- › specific modern slavery provisions are included in our asset management agreements, which govern the appointment of 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; and
- › having a detailed procurement plan with our two external property managers which requires all operational maintenance suppliers engaged on Growthpoint's behalf, 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 that is not pre-qualified must be approved by Growthpoint prior to appointment.

10. Sheffield Hallam University – 'In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains', 2021.

Monitoring and remediation processes.

Growthpoint is committed to implementing effective grievance reporting and remediation processes. We understand that we are responsible for providing or cooperating in situations where we have caused or contributed to harm as a result of modern slavery, and we may play a role in remediation where we are directly linked to such harm. We aim to work with our suppliers to enhance their modern slavery knowledge, and in circumstances where a potential issue is identified, to pro-actively respond, seek to understand the issue and implement necessary steps to remediate any incidents of modern slavery.

During the reporting period, we reviewed barriers to effective incident management and introduced the following initiatives:

- > implemented a modern slavery remediation framework to establish a transparent and consistent yet flexible approach for receiving and addressing modern slavery incidents. The framework is designed to meet the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights (UNGPs), including establishing internal mechanisms to enable us to investigate and remedy grievances promptly based on the nature and severity of incidents; and
- > introduced multi-lingual posters promoting our whistleblowing hotline in the back of house areas of our office portfolio. The poster is predominately targeted at cleaners and are translated to the most common foreign languages spoken in the cleaning industry within Australia, being Portuguese, Tamil, Nepalese, Thai, Spanish, and Sinhala. The poster provides information on how to spot the signs of modern slavery and contact details for reporting, either anonymously via our [Whistleblower Policy](#) or to the property manager or facility manager directly.

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 in relation to Growthpoint, including any illegal activity by Growthpoint's employees, officers, suppliers, associates and any of their relatives, spouses or dependants. The policy is readily accessible to all Growthpoint employees and the avenues for reporting are disclosed in high thoroughfare places throughout Growthpoint's head office, and more recently, in the back of house cleaner's rooms at our office assets as noted above.

- > **Code of Conduct:** applies to all officers and employees and requires the reporting of any unlawful and unethical behaviour or a breach of the Code of Conduct to the Managing Director or the Chairman of Growthpoint. This policy is readily accessible to all Growthpoint employees, contractors, and suppliers on our website.
- > **Supply Chain Sustainability Guidelines:** requires suppliers to notify Growthpoint of any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities of the guidelines. These guidelines are included as part of individual consultancy, service and works agreements directly entered into by Growthpoint and service agreements 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.

During the year, we reviewed and updated our [Whistleblower Policy](#) as part of a scheduled periodic review to reflect best practice and recent ASIC guidance. We recognise the importance of ensuring any reports are investigated in a fair and objective manner for all parties. Incidents of improper conduct can be reported via our external service provider, Your Call (including anonymous reporting) or to a designated internal whistleblower officer.

Approach to remediation

During the year, Growthpoint developed and implemented a framework to provide a grievance and remediation process for any reported modern slavery incidents in our operations and supply chains. The framework was developed by the MSTF and seeks to establish clear procedures for investigating and remediating modern slavery incidents that arise at Growthpoint. The process depends on the incident and presence of immediate danger or harm.

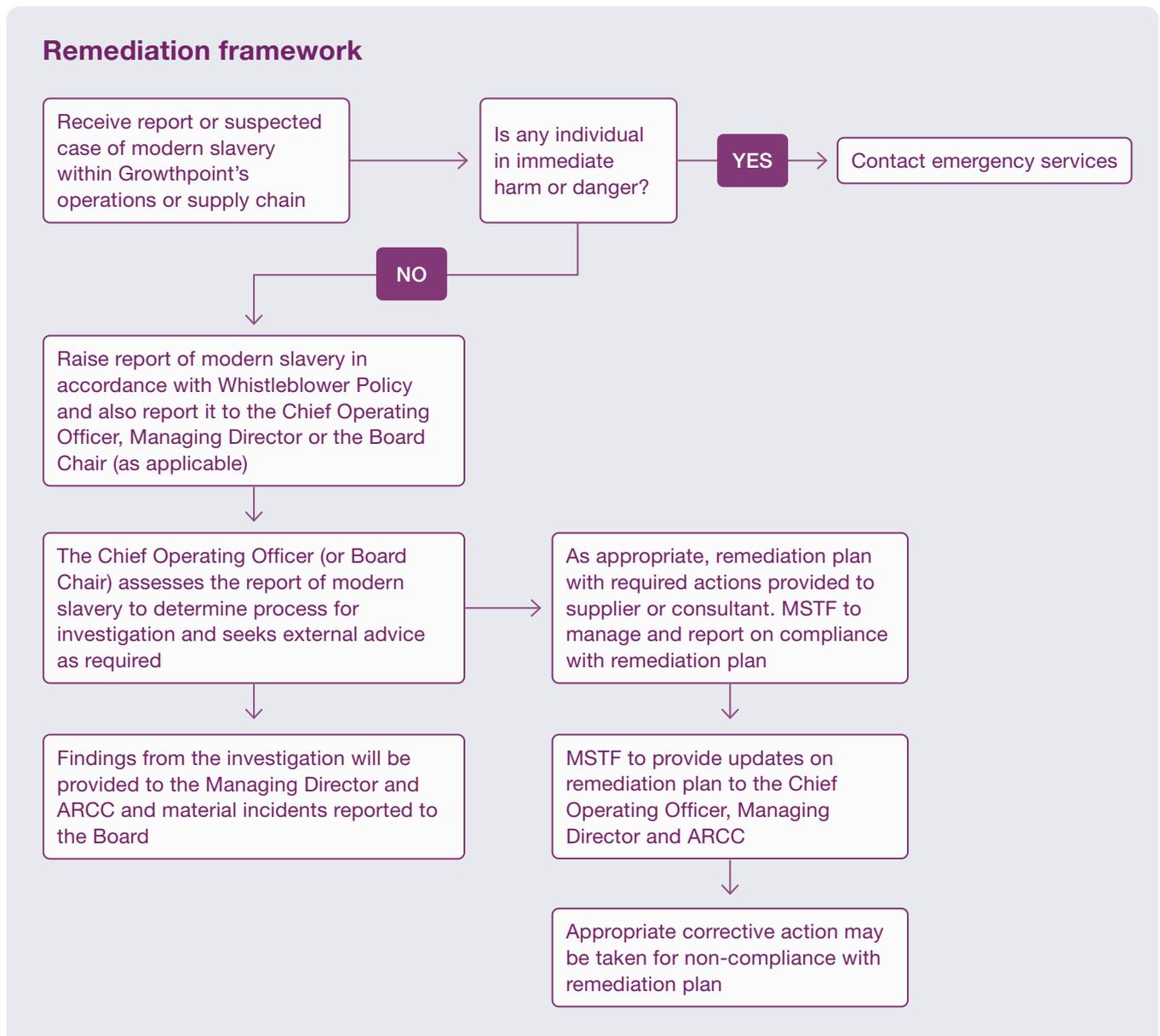
In circumstances where a potential modern slavery issue is identified, Growthpoint will pro-actively respond in a timely manner and seek to understand the issue and implement necessary steps to remediate any incidents of modern slavery with a focus on ensuring the safety of the complainant.

The appropriate action required by Growthpoint to remediate any reported instances of modern slavery will depend on whether Growthpoint has caused, contributed to, or is linked to the impact through our business relationships. In all cases,

Monitoring and remediation processes.

the focus of our remediation framework is on mitigating the risk of danger or harm to the individual experiencing the impact, and where applicable, leverage commercial relationships to foster improvement in employment standards.

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 which may include termination.



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 to measuring effectiveness during the reporting period included the following:

- > **Governance:**
 - Quarterly formal updates on modern slavery initiatives to the Sustainability Committee and relevant members of the EMT.
- > **Supply chain engagement:**
 - Regular discussions with external property managers on the procurement and monitoring of modern slavery risks.
 - Review of responses from security contractors to the modern slavery questionnaire.
- > **Monitoring and remediation:**
 - The MSTF met regularly to focus on modern slavery processes and initiatives, and actively reviewed and monitored Growthpoint's modern slavery priorities.
 - Review of the cost structure and pricing sheets by external property managers for high-risk suppliers.
- > **Knowledge and compliance**
 - Members of the MSTF attended industry training to understand best practice and new developments.
 - An annual employee survey to assess their health, safety and wellbeing.
 - External benchmarking of employees' remuneration against relevant remuneration data and relevant current awards to ensure compliance.

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

Incidents

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.

Our new Sustainability Framework contains two measurable targets on modern slavery to help Growthpoint maintain a responsible and sustainable supply chain. These targets relate to complying with the Act and setting and achieving a rolling program of annual targets to ensure continual improvement in our approach to addressing modern slavery. Our performance against these targets is subject to an annual assessment and requires the Sustainability Committee to assess the effectiveness of our approach to mitigate modern slavery risks and to provide an update to the ARCC and the Board. This will assist Growthpoint in setting performance metrics and targets to report on our effectiveness.

Monitoring compliance

During an external property manager's compliance monitoring of the cost structure of cleaning contractors, a single anomaly was identified with one contractor at one site regarding the payment of the Cleaning Services Modern Award for a Saturday. The external property manager notified the cleaning contractor of this discrepancy and worked with the company to confirm all employees were paid their fair entitlements based on the current Cleaning Services Modern Award. Whilst not an incident of modern slavery, Growthpoint and our external property managers are aware of the need to collaborate with service providers to ensure ongoing compliance with the Fair Work Act and modern awards which are subject to regular change.

Measuring effectiveness.

Tracking effectiveness against our FY22 priorities

The following actions were undertaken by Growthpoint in FY22 following our commitment to enhance our modern slavery initiatives and processes:

FY22 priorities	FY22 actions
Develop a specific training session for the Growthpoint Board focussed on risk and reporting of modern slavery in our business and operations.	Delivered a tailored training session for the Growthpoint Board, in conjunction with an external law firm, that 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.	Continued our engagement with external property managers (including internal asset managers as required) on their approach to identifying and managing suppliers of higher-risk services, with a focus on cleaning and security service providers, and distributed an information sheet on modern slavery training materials and policies to all cleaners and security contractors engaged by our external property managers.
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.	All questionnaire responses were reviewed by the MSTF to ensure the relevant contractor has appropriate awareness of modern slavery risks in their operations and supply chains and policies and measures in place relevant for the business prior to engagement.
Undertake a targeted pre-qualification process for the procurement of solar panel providers in respect of modern slavery risks.	Introduced a requirement that all solar panel providers (regardless of the value of the project) complete our modern slavery questionnaire and respond to specific questions on how they are identifying and managing risks in their supply chains.
Expand the scope of Growthpoint's risk assessment through the engagement of an external third-party consultant to undertake supply chain mapping.	Engaged a specialist independent modern slavery consultant, Fair Supply, to complete a deep dive data analysis risk assessment of our supply chain to identify highest risk sectors and suppliers based on spend.
Collaborate with our external property managers to assess our supplier's compliance with the modern slavery initiatives and the Act.	Ongoing review of the modern slavery statements of our external property managers to ensure Growthpoint is satisfied with the adequacy of disclosures and regular discussion regarding their internal procedures to identify and manage their modern slavery risks when on-boarding suppliers.
Develop a remediation process to guide any reported instances of modern slavery.	Implemented a modern slavery remediation framework to guide any reported instances of modern slavery.

Consultation and approval

This statement was prepared by the cross functional MSTF through active collaboration and working group meetings to determine the actions and mitigation strategies undertaken by the Group. All mitigation strategies, policies, risk assessments and other measures described in this statement apply to our controlled entities.

This statement was subject to review, feedback and approval from Group’s centralised management, governance and reporting structure, including members of the EMT, the ARCC and the Board through meetings and circulating the draft statement for comment.

Looking ahead.

We are aware that mitigating the risks of modern slavery across our operations and supply chains requires continued action and ongoing management. To support this, our proposed actions to strengthen our response to modern slavery risks for FY23 and beyond are set out below:

Integration of Fortius	<ul style="list-style-type: none"> ➢ Review the operations and supply chains of Fortius, a funds management business that Growthpoint acquired in September 2022, to assess and mitigate modern slavery risks ➢ Integrate the Fortius business within Growthpoint’s established operational practices and initiatives for modern slavery and to develop collaborative improvement actions
Supply chain engagement	<ul style="list-style-type: none"> ➢ Introduce mandatory annual refresher modern slavery training for all employees to recognise the risks and instances of modern slavery ➢ Continue to engage with employees, property managers, tenants and suppliers on modern slavery information, measures and initiatives
Monitoring and remediation	<ul style="list-style-type: none"> ➢ Establish a formal framework to measure the effectiveness of our modern slavery mitigation strategies

Contact us

We welcome feedback or enquiries on this statement to ensure we provide our stakeholders with the right information to make informed decisions and to inform our own responses to managing modern slavery risks.

Please email your feedback to investor.relations@growthpoint.com.au

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