



modern slavery statement.

For the year ended June 2020

We acknowledge that modern slavery is a significant human rights abuse and we support the protection of human rights throughout our operations and supply chains.

This is the first 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 This statement has been made pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) (Act), prepared by Growthpoint's Modern Slavery Task Force and approved by Growthpoint's Board. It 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 2020 (FY20).

Growthpoint does not tolerate non-compliance with modern slavery laws. We understand the need for ongoing action to mitigate and monitor the risks of modern slavery practices in our operations. As a commitment to our continuous improvement, we also disclose our proposed actions on modern slavery for FY21 and beyond.

Our key actions in FY20.



Governance

Established a Modern Slavery Task Force (MSTF) to determine our modern slavery program and priorities.



Policy and Processes

Updated our Supply Chain Sustainability Guidelines to emphasise our expectations of modern slavery monitoring, compliance and reporting by our suppliers.



Supplier contracts

Strengthened our consultancy agreements with suppliers to include modern slavery contractual provisions.



Due diligence

Engaged with our property managers to confirm they have embedded or planned due diligence processes for suppliers of potential high-risk services.



Risk assessment

Assessed our operations and supply chain for potential modern slavery risk. This determined our focus on our external property managers who procure the majority of the potential higher-risk services for the Group.



Engagement

Worked with our external property managers to understand their control activities and initiatives to mitigate modern slavery risks.

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 FY20 Annual Report.

Overview of Growthpoint.

Our structure and operations

Growthpoint is a real estate investment trust (REIT), listed on the ASX (ASX code: GOZ) and is part of the S&P/ASX 200 Index.

As at 30 June 2020, we owned and managed 58 high-quality commercial and industrial properties across Australia, valued at approximately \$4.2 billion.

We are committed to operating in a sustainable way, being a positive contributor to the communities in which we operate and reducing our impact on the environment.

Growthpoint was established in 2009 and has an internalised management for the Company and Trust, headquartered in Melbourne. We are domiciled in Australia and our operations are subject to Australian laws. Our property investments and corporate operations operate wholly within Australia. Please refer to our **FY20 Annual Report** for a list of controlled entities for the FY20 year.

Our values underpin everything we do



Respect



Success



Inclusion



Integrity



Fun

Our portfolio

as at 30 June 2020



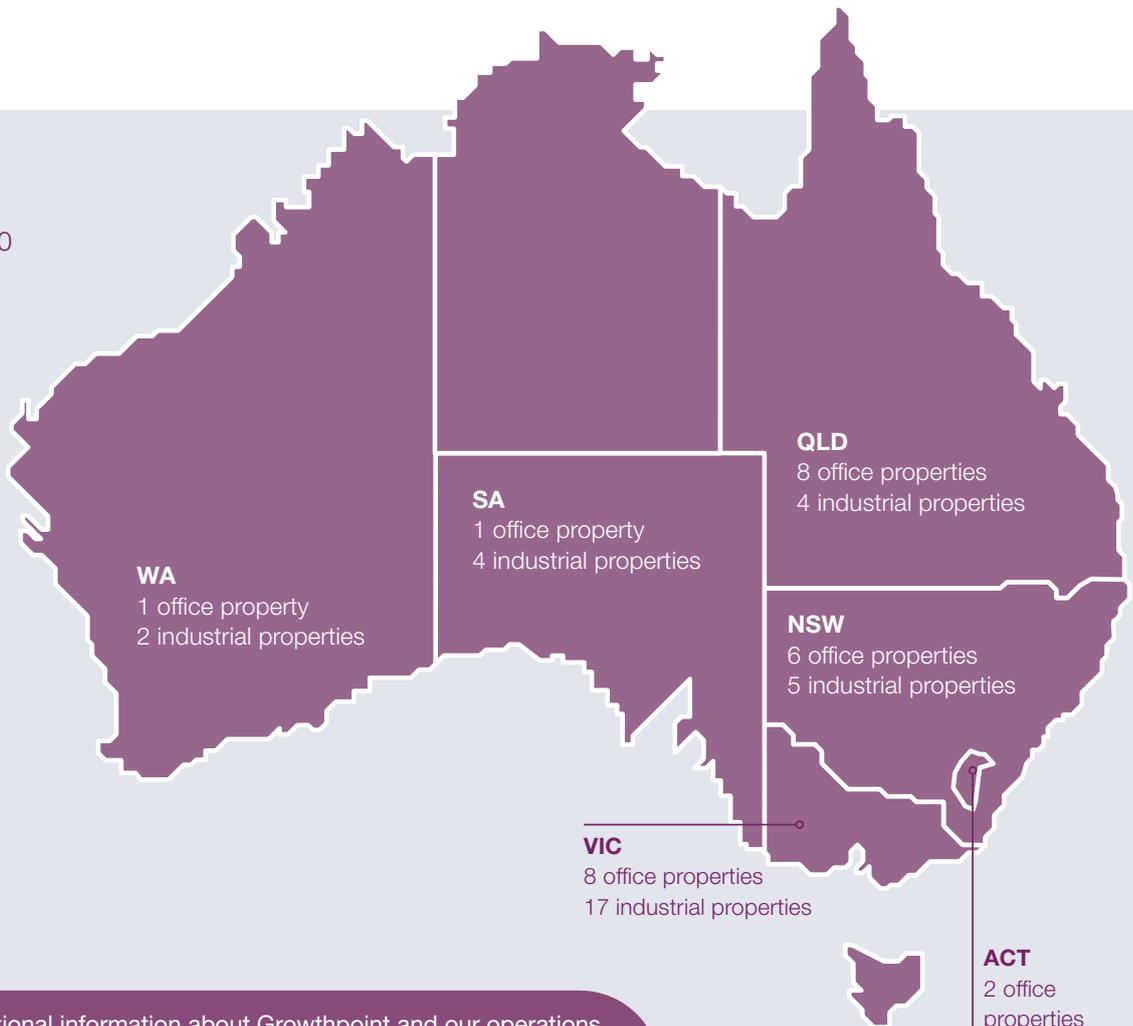
163 tenants



26 office properties



32 industrial properties



Additional information about Growthpoint and our operations can be found on our website and in our FY20 Annual Report, Sustainability Report and Corporate Governance Statement which are available at growthpoint.com.au

Our supply chain.

Asset management

An integral part of Growthpoint's supply chain, in connection with the operations of our property portfolio, are the external service providers who manage our properties and engage contractors and suppliers as part of the day-to-day operation and maintenance of our properties. This includes the engagement of potential high-risk services such as cleaning, security, maintenance and building services. In FY20, our external property managers engaged approximately 800 contractors and suppliers across our property portfolio.

Corporate operations

Growthpoint has a centralised procurement practice for the direct engagement of products and services to assist with its head office operations and administering the Group's business including legal, valuations, sustainability, finance and tax professional advice.

As at 30 June 2020, our direct workforce comprised 28 employees across business functions, including asset management, valuations, legal, finance, projects and corporate functions and are predominately based at our head office, or properties within our portfolio. Our employees are paid a remuneration package which is competitive with rates within the ASX A-REIT sector and ASX listed companies of a similar size, and above the Australian minimum wage for award employees.

Development and projects

We directly engage suppliers and consultants in connection with the development of our assets, refurbishment works and large capital expenditure projects. Our suppliers cover the full development process and include design, construction, planning and project management.

Our risk identification and assessment.

Risk assessment

In FY20, the MSTF undertook an assessment of modern slavery risk in our operations and supply chain.

Growthpoint identified that our highest potential exposure to modern slavery risk is through the engagement of suppliers by our external property managers as part of the day-to-day management and maintenance of our properties. This risk assessment was determined based on the following:

- › **Sector and industry risks:** property managers engage a number of higher risk services which are essential to property management, including, property maintenance operations, janitorial, cleaning, landscaping and security services.

- › **Workforce risks:** these services have an inherent risk to modern slavery as these positions often have lower wages, involve manual labour and are frequently on a casual basis. Such workers can also be from vulnerable demographics, including from migrant, low socioeconomic, or culturally and linguistically diverse backgrounds.

Accordingly, there are risks that Growthpoint may be linked to potential modern slavery practices (such as labour practices) as part of procurement by our externally appointed property managers.

The MSTF have engaged with Growthpoint's property managers to:

- › better understand their internal policies and approach to identifying suppliers of higher-risk services and mitigating the risk of modern slavery in their supply chain; and
- › confirm that they have embedded due diligence processes as part of the onboarding of suppliers or plans to enhance their processes.

Our property managers are required to comply with the *Modern Slavery Act 2018* (Cth) and issue yearly modern slavery statements of their own.

Growthpoint recognises that the relationship between our property management providers and the suppliers they engage is a critical component of our supply chain. We will continue to engage with our property managers in relation to their modern slavery protocols and initiatives and reinforce the importance of prioritising the assessment and mitigation of modern slavery risks when engaging suppliers to undertake potential high-risk services for our properties.

Grievance processes

Growthpoint has established a number of mechanisms where concerns of suspected or actual illegal activity (such as modern slavery) can be reported including:

- › **Whistleblower Policy:** which encourages the reporting of any misconduct or an improper state of affairs or circumstances, including any illegal activity (which would extend to modern slavery) by Growthpoint employees, directors, suppliers and relatives of these individuals.
- › **Code of Conduct:** requires the reporting of any unlawful and unethical behaviour or a breach of the Code of Conduct to be reported to the Managing Director or the Chairman of Growthpoint.

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

Our approach to modern slavery.

Governance

The Board has overall responsibility for the establishment and oversight of the Group’s risk management framework. The Board has established the Audit, Risk and Compliance Committee, which is responsible for the framework and oversight of compliance with the Group’s risk management policies and procedures. This includes our approach to modern slavery risks.

In early FY20, Growthpoint established the MSTF with representatives from the risk and compliance, legal and sustainability teams. The MSTF developed the modern slavery program and determined the priorities to focus on, undertook an evaluation of the modern slavery risks in Growthpoint’s operations and supply chain and prepared this statement. The MSTF provides regular updates to the Sustainability Task Force and Executive Management Team in respect of Growthpoint’s modern slavery response and future priorities.



Policy and processes

Growthpoint’s commitment to responsible work practices is underpinned by various internal policies including the Growthpoint Code of Conduct, Anti-Bribery and Corruption Policy, Whistleblower Policy and Diversity Policy. These all can be found on our website at growthpoint.com.au.

In FY20, we updated our Supply Chain Sustainability Guidelines to strengthen and broaden our requirements for suppliers, contractors and service providers. The amended Supply Chain Sustainability Guidelines include enhanced requirements and obligations in relation to modern slavery, labour practices, freedom of association and human rights legislation. The Supply Chain Sustainability Guidelines now require all suppliers to monitor their compliance and outlines the process for suppliers to raise any concerns about an actual or suspected breach of the guidelines, including in relation to modern slavery.

Supplier contracts

In FY20, we introduced a modern slavery contractual provision for our consultancy agreements with suppliers to reinforce our expectation that suppliers and consultants comply with:

- > all relevant modern slavery laws; and
- > Growthpoint’s Supply Chain Sustainability Guidelines.

The contractual clause also requires suppliers and consultants to notify Growthpoint if they become aware that they have engaged, or any of their subsidiaries, sub-contractors or suppliers have engaged, in modern slavery practices.

 [view our Supply Chain Sustainability Guidelines](#)

Impact of the COVID-19 pandemic

We were unable to fully implement some of our key actions due to the COVID-19 pandemic including scheduled face-to-face employee training. We intend to develop and deliver modern slavery training during FY21 to increase employee understanding and awareness of modern slavery risks in day-to-day operations.

The COVID-19 pandemic has resulted in an increased focus and demand on the cleaning services sector. The sector is a high-risk industry for modern slavery risks due to the inherent nature of the workforce. Growthpoint recognises that the need for essential cleaning services during the COVID-19 pandemic may place additional pressure on cleaning service suppliers and enhance the risk of unlawful labour practices. We will engage with our property managers to reinforce our requirement that cleaning service suppliers comply with our Supply Chain Sustainability Guidelines.

Measuring effectiveness.

Growthpoint undertook a number of essential activities in FY20 to establish a foundation for our modern slavery response, including assessment of our management of modern slavery risks.

Understanding Growthpoint's broader supply chain is a complex process due to the variety of supplier contracts required to support our operations.

The MSTF will continue to develop Growthpoint's response towards the identification and monitoring of modern slavery within our operations and supply chain, and to monitor the effectiveness of our actions in future statements.

Looking ahead.

Our priorities for FY21 and beyond are:

Continued engagement with suppliers

- › Ongoing engagement with our property managers on modern slavery issues, including to confirm measures and initiatives are in place to mitigate the risk of modern slavery practice.
- › Implement a requirement for all key suppliers of Growthpoint, with consolidated revenue over \$100 million, to provide a copy of their modern slavery statement as part of their yearly review.

Due diligence

- › A focus on due diligence procedures for high-risk contractors and suppliers directly engaged by Growthpoint.

Development of internal policies and training

- › Development of a staff training program for all Growthpoint employees to recognise the risks and instances of modern slavery.
- › Continue to refine our key governance policies and contracts to mitigate the risks of modern slavery and improve our approach to procurement and supply chain governance.

This modern slavery statement was approved by the Board of Growthpoint Properties Australia Limited on behalf of itself and as responsible entity for the Growthpoint Properties Australia Trust on 19 November 2020.



Timothy Collyer, **Managing Director**