



Sustainability Policy

Purpose

Growthpoint Properties Australia (**Growthpoint**) is committed to conducting its business to the highest standard and a culture of corporate compliance, integrity and responsible and ethical behaviour. Additionally, we are committed to reducing, and where appropriate and possible, improving environmental and social outcomes through our operations. Our governance framework will facilitate being a more sustainable business which is congruent to providing sustainable financial growth for security holders.

This policy outlines Growthpoint's sustainability commitments and actions to meet the needs of our business and stakeholders.

Policy application

All Growthpoint employees must comply with this policy.

Policy

1. Coverage and Stakeholders

This policy applies to Growthpoint Properties Australia Limited (**GPAL**) and its controlled entities. We encourage our business partners and suppliers to support our commitments, as outlined in our publicly available [Supply Chain Sustainability Guidelines](#), which detail our expectations for responsible supplier conduct.

The stakeholders that can impact, influence or contribute to the actions detailed within this policy include:

- securityholders and other providers of capital;
- employees and officers;
- tenants;
- suppliers and service providers;
- communities in which Growthpoint's operations are conducted;
- industry associations and peak bodies; and
- government and regulatory authorities, including the ASX.

Growthpoint commits to regular engagement and collaboration with stakeholders to understand their most important sustainability challenges and consider how we will address these challenges through our sustainability program.

2. Commitments and actions

Growthpoint's Sustainability Framework (**Framework**) defines its approach to sustainability. The Framework comprises four themes that drive actions to help Growthpoint manage sustainability-related risks and capitalise on opportunities to strengthen our business for our stakeholders. Growthpoint's sustainability commitments and actions are detailed below under the four themes of its Framework – governance, environment, economic and people.

2.1 Governance

Growthpoint commits to maintaining an effective governance structure to ensure our sustainability program is a contributor to achieving wider business goals. Growthpoint will undertake the following key actions to achieve this:

- implement the Framework, including objectives and targets;
- publish timely, accurate and transparent information on Growthpoint’s sustainability performance through voluntary disclosures and compliance with relevant mandatory reporting regulations including our Annual Report, Sustainability Report, Modern Slavery Statement and participation in investor benchmarks such as the Global Real Estate Sustainability Benchmark (GRESB); and
- link remuneration outcomes to the successful achievement of sustainability targets for the Executive Management Team and other key employees.

2.2 Environment

Growthpoint commits to managing environmental risk and capitalising on opportunity to preserve and enhance commercial value for the business and our stakeholders. Growthpoint will undertake the following key actions to achieve this:

- mitigate its climate change impact by achieving its target of net zero emissions by 1 July 2025¹ through its program of:
 - building optimisation – continuous monitoring, analysis, reporting and active adjustment of building operations to improve performance;
 - energy efficiency upgrades, electrification and onsite solar installations – evaluate and pursue commercially feasible opportunities across the operationally controlled office portfolio;
 - procurement of offsite renewable energy and carbon offsets – source all direct electricity needs from renewable sources and invest in high quality carbon offsets to compensate for those energy sources we are unable to fuel switch or avoid;
- use materials that have less environmental impacts (for example, less embodied carbon), reduce direct consumption of water and understand and manage the Group’s biodiversity impacts;
- collaborate with tenants through contractual mechanisms (for example, green leases and co-investments in onsite renewable energy) and informal channels to minimise the environmental impacts of operating their tenancies; and
- adopt circularity principles to assist tenants to reduce the amount of waste generated and increase the proportion of waste diverted from landfill.

2.3 Economic

Growthpoint commits to contributing to broader sustainability advancements in its value chain. Growthpoint will undertake the following key actions to achieve this:

- identify and assess climate change risks and respond by implementing resilience and adaptation measures through our capital investment and operating processes; and
- seek to establish commercial relationships with social enterprises and minority-led businesses.

2.4 People

Growthpoint commits to listening and responding to feedback from key stakeholders and delivering programs that create shared value. Growthpoint will undertake the following key actions to achieve this:

- understand the needs of its tenants through formal and informal channels and respond to these needs through targeted initiatives;
- establish sustainability practices in building operation to optimise performance and maximise tenant comfort, satisfaction and indoor environment quality;
- execute a suite of employee focused programs to maintain a culture of respect and inclusivity, high levels of engagement and alignment, and health and wellbeing;

¹ Scopes 1 and 2 emissions across our operationally controlled office assets and Scopes 1, 2 and some Scope 3 emissions across our corporate activities.



- maintain employee engagement with the sustainability program through education and communication on sustainability issues;
- ensure compliance with relevant legislation, including the *Modern Slavery Act 2018* (Cth);
- encourage suppliers to comply with relevant legislation and align with Growthpoint's Code of Conduct and Supply Chain Sustainability Guidelines;
- deliver a targeted program of community investment to create impacts with strategically aligned charitable causes; and
- maintain a safety aware culture through appropriate employee training, programs and a system of monitoring of incidents.

Responsible investment and funds management

As a fund manager, Growthpoint recognises its responsibility to act in the best interests of its investment partners. We believe that integrating sustainability considerations into investment decisions and third-party property portfolio management enhances long-term value for both Growthpoint and our partners.

For third-party managed assets, our approach is guided by the Framework, and we are committed to:

- Embedding sustainability factors in investment decisions.
- Integrating sustainability into our ownership and management practices.
- Measuring and reporting on material sustainability factors.
- Using independent sustainability ratings to benchmark and disclose asset performance.
- Collaborating with industry bodies and stakeholders to advance sustainability in the property sector.

Monitoring and reporting of policy

Growthpoint's compliance with this policy will be monitored by the internal Sustainability Team and our performance will be disclosed via our Sustainability Report, Modern Slavery Statement and Annual Report.

Training and accessibility of policy

This policy is communicated to all new employees as part of the induction process and through ad hoc internal sustainability training sessions.

This policy is readily accessible to all Growthpoint officers and employees through Growthpoint's internal policy register and website.

Related policies

This policy is an integral part of Growthpoint's compliance framework and should be read in conjunction with Growthpoint's Code of Conduct, Diversity, Equity and Inclusion Policy, Whistleblower Policy, and Supply Chain Sustainability Guidelines.

Policy review

This policy will be periodically reviewed, at least every three years, to ensure that it is operating effectively to meet the needs of Growthpoint or earlier in response to any significant operational or regulatory developments.

Policy approval date

19 June 2025 by the Board.