



modern slavery statement.

For the year ended 30 June 2023

About this modern slavery statement

Growthpoint strives to deliver positive outcomes for all stakeholders. We recognise that this commitment requires Growthpoint to prioritise and promote the human rights and safe working environments of all employees, contractors and suppliers. Modern slavery has emerged as a global issue and we acknowledge our responsibility to prevent, mitigate and address incidents of modern slavery in both our operations and supply chain. Non-compliance with modern slavery laws will not be tolerated at Growthpoint.

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.¹

Throughout the financial year ending on 30 June 2023 (FY23 or the reporting period), Growthpoint has continued its efforts to improve and take pro-active steps to mitigate the risks of modern slavery within our business. Transparent reporting remains a cornerstone of our approach and we are committed to complying with the Modern Slavery Act 2018 (Cth) (Act).

This is the fourth statement from Growthpoint Properties Australia, a stapled entity structure, comprising Growthpoint Properties Australia Limited (Company) and Growthpoint Properties Australia Trust (Trust) (Growthpoint)². 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 presents the measures we have undertaken to assess and address modern slavery risks within our operations and supply chains during FY23, in accordance with section 16 of the Act.

On 15 November 2023, the Board of the Company on behalf of itself and as responsible entity of the Trust, approved this modern slavery statement, signifying our commitment to mitigating modern slavery within our business and promoting ethical business practices.

Timothy Collyer
Managing Director

15 November 2023

¹ An interpretation of the definition of 'modern slavery' in the Modern Slavery Act 2018 (Cth).

² In this statement a reference to 'Growthpoint', 'Group', 'we', and 'our' is to Growthpoint Properties Australia and its controlled entities as outlined in our FY23 Annual Report.

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	3-8
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	9-12
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	13-14
Describe how the reporting entity assesses the effectiveness of these actions	15
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	16
Any other information that the reporting entity considers relevant	16

Key highlights in FY23

Focus area	Achievements
Employee training	Delivered online modern slavery training on recognising the risks and instances of modern slavery to staff via our human resources information system
Integration of Fortius	Integrated the Fortius Funds Management business within Growthpoint’s established operational practices and initiatives for modern slavery and undertook a review of their external property managers
Supply chain engagement	Implemented enhanced due diligence for solar panel procurement and high-risk suppliers identified by our FY22 supply chain deep dive risk assessment
Effective monitoring	Established a formal framework, including KPIs, to measure the effectiveness of our modern slavery mitigation strategies

Our progress

Key milestones over the past three years

- FY20**
- Established a Modern Slavery Task Force (MSTF).
 - Updated our Supply Chain Sustainability Guidelines (SCSG) to include modern slavery monitoring, compliance and reporting requirements.
 - Introduced modern slavery contractual provisions into our standard form supplier consultancy agreements.
 - Internally assessed our operations and supply chain for potential modern slavery risks.
 - Engaged with our external property managers to understand their due diligence processes and initiatives to mitigate modern slavery risks.
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- FY21**
- Provided mandatory employee training on how to identify modern slavery risks.
 - Developed a supplier modern slavery due diligence questionnaire.
 - Introduced a requirement for building and construction suppliers for contracts above \$150,000 to complete the questionnaire as a tender pre-requisite.
 - Updated agreements with our external property managers to include modern slavery contractual obligations.
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- FY22**
- Engaged a modern slavery consultant to undertake a data analytics risk assessment of our supply chain to identify the highest modern slavery risk sectors.
 - Developed a modern slavery remediation framework to guide our responses to reported incidents of modern slavery.
 - Introduced a requirement that solar panel providers complete our modern slavery questionnaire and established a list of pre-qualified suppliers to deliver solar projects.
 - Provided customised training to the Group's Board on modern slavery risks and reporting.
 - Implemented a procurement plan with our external property managers requiring all operational maintenance suppliers to be assessed for modern slavery risks.
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For additional details on our progress since FY20, please refer to our previous modern slavery statements, available for download on our [website](#).

Our structure and operations

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. Since 2009, we have been investing in high-quality industrial and office properties in Australia to provide spaces for businesses to thrive.

As at 30 June 2023, we have \$6.6 billion total assets under management. We directly own and manage 58 high quality, modern office and industrial properties, valued at \$4.8 billion. We actively manage our portfolio and invest in our existing properties, ensuring they meet our tenants' needs now and into the future. We are also focussed on growing our property portfolio.

We manage a further \$1.8 billion on behalf of third-party investors through our funds management business, which manages funds that invest in office, retail and mixed-use properties across value-add and opportunistic strategies.

We are committed to operating in a sustainable way and being a positive contributor in the communities in which we operate. We believe this is key to achieving 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.



Respect:
dealing with others openly, honestly and respectfully



Success:
valuing performance, hard work and high standards



Inclusion:
appreciating our diversity, heritage and perspectives

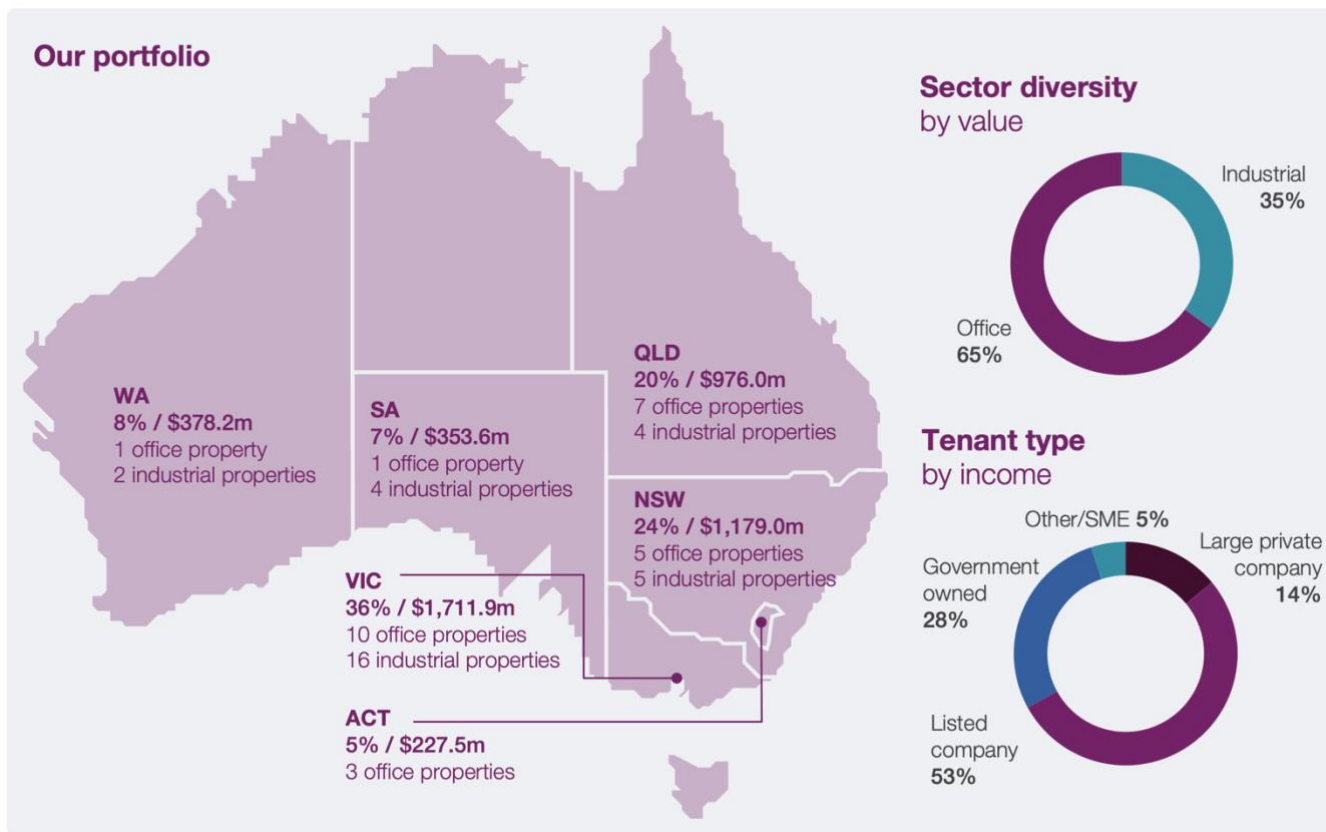


Integrity:
doing the right thing for tenants, investors and team



Fun:
enjoying work, being sociable and playing as a team

Key directly owned portfolio metrics, as at 30 June 2023:



Total properties	Property portfolio value	Market capitalisation	Total employees	Number of tenants	Number of investors
58	\$4.8b	\$2.1b	62	161	4440

Our operations

Growthpoint’s business operations for FY23 included asset management, capital expenditure programs, 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, industrial, retail and mixed use sectors.

During the reporting period, Growthpoint acquired 100% of the shares in Fortius Funds Management Pty Ltd (Fortius). Fortius is a real estate funds management business that manages funds that invest in office, retail

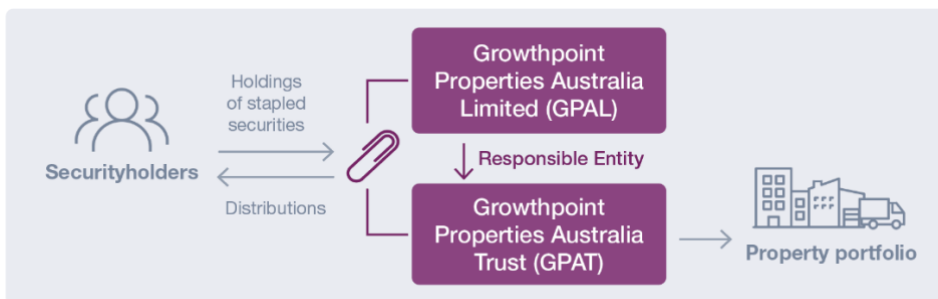
and mixed use properties across value add and opportunistic strategies. With the acquisition of Fortius, Growthpoint expanded its business operations to include funds management, with a total of \$1.8 billion of funds under management (FUM).

During the reporting period, the majority of Growthpoint's earnings were derived from rental income received from tenants. Ancillary income was generated from funds management, 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 generally subject to the same key policies (unless stated within the policy), procurement and executive management. Accordingly, this statement also covers the operations and the supply chains of the Group.

A full list of Growthpoint's controlled entities for FY23 is provided on pages 96-97 of our [FY23 Annual Report](#). Further information about our business is also provided in that report.



Our direct workforce

As of 30 June 2023, Growthpoint had a dedicated workforce of 64 employees directly employed by the Company. This team consists of 62 permanent employees, of which six are part-time and the rest are full time with two casual employees, all working together to support our diverse business operations. Our employees provide professional services across various areas, including asset management, funds management, valuations, legal, compliance, risk, finance, human resources, projects, sustainability and corporate functions.

Our headquarters is in Melbourne (36 employees), with other offices in Sydney (24 employees) and Brisbane (two employees).

For more detailed information about our permanent workforce, please refer to our [FY23 Sustainability Databook](#).

Our supply chain

Growthpoint operates exclusively within Australia, conducting its business operations and investments within the country. Throughout FY23, Growthpoint engaged approximately 1,325 suppliers across our corporate operations, balance sheet portfolio and funds management business, whether through direct engagement or indirectly through its external property managers. These suppliers collectively provide goods and services in three key areas: asset management, development and projects and corporate operations.

Our suppliers come from various industries and encompass a range of sizes. They include property management services, construction, property agents, engineering firms, property maintenance, cleaning services and information technology providers. While most of our suppliers are based in Australia, many of them have complex and diverse supply chains that extend globally.

FY23 top five supplier spend categories

The table below shows our top five spend categories for FY23 (excluding statutory rates and taxation, employee salaries and utilities).

Spend category	Spend description	% spend
Development and capital projects	Capital works (e.g. building and construction, tenant fit-outs and plant and equipment upgrades)	39%
Asset management	Property management related consultants (e.g. property management, leasing and sales agents, engineering, architects and valuers)	31%
	Property maintenance related services (e.g. electricians, waste and recycling, lifts and elevators and garden maintenance)	16%
	Cleaning and security	8%
Corporate operations	Other (e.g. catering, insurance, legal consultants, couriers and photography)	6%

Asset management

- Across the Group, we engage three external property management companies (JLL, CBRE and Knight Frank) to oversee the day-to-day operations of our balance sheet and fund managed properties.
- External property managers procure all property maintenance related services, including the services identified as being of higher risk of modern slavery on our behalf such as cleaning, security, maintenance and building services.
- JLL, CBRE and Knight Frank are required to report under the Act and we review their annual modern slavery statements.

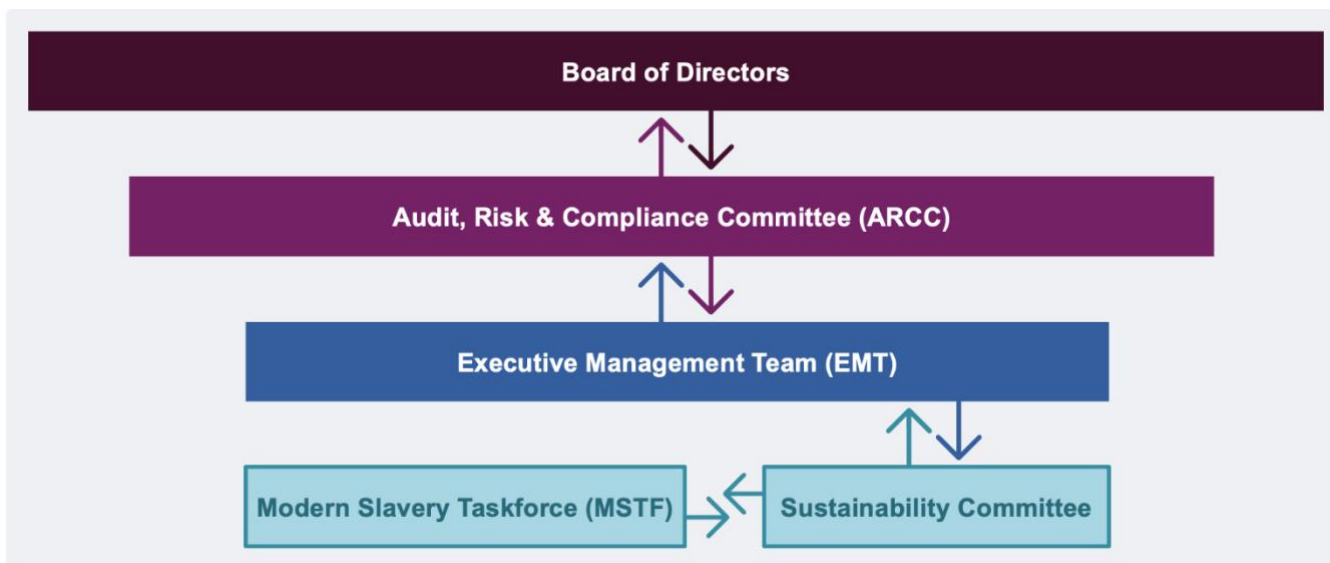
Development and capital projects

- We directly engage contractors, suppliers and consultants for asset development, expansions, refurbishment and fit-out projects, solar installations and building plant and equipment capital expenditure projects.
- We primarily directly engage Australian-based contractors, suppliers and consultants.
- Contractors, suppliers and consultants are involved in the full development process covering design, construction, planning and project management.
- These contractors, suppliers and consultants may procure raw materials from outside of Australia and are generally not permitted to subcontract services without our prior approval.

Corporate operations

- We have a centralised procurement practice for products and services supporting corporate office operations, funds management and business administration.
- We typically engage Australian-based firms for a broad range of consulting and professional services that are important to Growthpoint's operations.

Our governance and policies



Growthpoint's governance framework seeks to ensure accountability, transparency and effective risk management, and reinforces an ethical and responsible culture that prioritises the best interests of investors.

Growthpoint Board of Directors

The Board is responsible for setting the strategic direction and overseeing management of the Group. The Board has key responsibilities which include establishing and monitoring the risk management framework and overseeing compliance with legal and regulatory requirements. Modern slavery issues are addressed through this framework and the Board approves the Modern Slavery Statement.

The Audit, Risk and Compliance Committee

The Audit, Risk and Compliance Committee (ARCC) assists the Board in ensuring compliance with the Act and overseeing the Group's modern slavery risk management protocols. The ARCC performs two key roles related to modern slavery: overseeing the execution of the Group's Risk Management Framework for managing modern slavery risks and reviewing and endorsing the Modern Slavery Statement for Board approval.

Executive Management Team

The Executive Management Team (EMT) provides strategic direction to the MSTF on the implementation of modern slavery actions and initiatives via the Sustainability Committee and on an ad hoc and ongoing basis.

Sustainability Committee

The Sustainability Committee oversees the implementation of sustainability initiatives ensuring progress towards targets in the Sustainability Framework. The Committee is chaired by the Sustainability Manager and committee members include the Chief Investment Officer and representatives from the Projects and Sustainability, Asset Management, People and Culture and Investor Relations teams.

At each quarterly meeting of the Sustainability Committee, the Chair of the MSTF provides a comprehensive and detailed update on the actions the MSTF have taken and initiatives in the pipeline to mitigate the modern slavery risks. This collaborative forum allows the Sustainability Committee to offer feedback to incorporate into our modern slavery response planning and implementation.

Modern Slavery Task Force

The MSTF is an internal working group responsible for developing and implementing the Group's modern slavery response. Chaired by the Sustainability Manager, it comprises members from Legal, Risk and Compliance and Asset Management teams (both from the balance sheet and funds management business). The MSTF sets priorities, ensures practical implementation of initiatives, fosters communication on modern slavery matters and prepares the annual Modern Slavery Statement.

Additionally, the MSTF contributes to the Group's semi-annual risk review conducted by the Risk and Compliance team, ensuring appropriate identification and assessment of modern slavery risks and rating in accordance with the Group's Risk Management Framework. This facilitates updates to the ARCC if there are any changes to our modern slavery residual risk exposure during a reporting period.

Key governance documents

Growthpoint upholds responsible work practices through a suite of key policies and guidelines applicable to the Group (unless stated otherwise in the policy). These documents remain consistent with previous years, with our Supply Chain Sustainability Guidelines updated in FY23 to reinforce our expectations regarding modern slavery risk management and incident reporting by our suppliers.

Document	Purpose
Sustainability Policy	This policy outlines Growthpoint's sustainability commitments and actions to meet the needs of our business and stakeholders. It includes a commitment to undertake actions to ensure Growthpoint and its suppliers comply with the Act and an expectation that suppliers uphold the principles of the Supply Chain Sustainability Guidelines.
Whistleblower Policy	This policy encourages, protects and supports the reporting of any misconduct, fraud, inappropriate behaviour or improper state of affairs, and provides transparency regarding the mechanism for receiving, handling and investigating reports.
Supply Chain Sustainability Guidelines	These guidelines outline our requirements for suppliers, contractors and service providers, including ethical behaviour, anti-corruption and bribery prevention, whistleblower protection, compliance with laws and regulations, and the eradication of modern slavery.

Periodic reviews and updates of the above policies and guidelines covering our approach to modern slavery are communicated to employees, with policies centrally located on Growthpoint's internal file sharing system and key policies also available for download on our website. Non-minor breaches of relevant policies are reported to the ARCC, with high-rated breaches reported to the Board and external auditors.

In addition to the governance documents, Growthpoint's Sustainability Framework consists of 20 measurable targets, including two targets specifically focused on addressing modern slavery risks. The Sustainability Framework is disclosed on pages 9-11 of our [FY23 Sustainability Report](#).

Modern slavery risks in our operations and supply chain

Determining where Growthpoint may be involved in modern slavery

Growthpoint is aware that to address modern slavery risks within our corporate operations and supply chains, we need to identify how Growthpoint may **cause, contribute** or be **directly linked** to modern slavery risks. We consider our risk of causing, contributing or being directly linked to modern slavery in our internal operations to be **very low**. 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 products.

Identifying risks in our corporate operations

All our employees, including those in the Fortius funds management business, are skilled professionals who work exclusively within Australia. They receive a competitive remuneration package, benchmarked against relevant remuneration data, that exceeds the minimum wage mandated by Australian laws, including the Fair Work Act 2009 (Cth) and applicable modern awards.

We continue to maintain a very low risk rating of modern slavery risks within our operations.

Assessing and addressing 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.

Employee initiatives

Our focus as an employer is to ensure that we are providing and maintaining a safe and healthy workplace for all our people, this includes, being free from modern slavery in our corporate operations. To support this, we actively engage in various activities and initiatives to maintain high standards for Growthpoint's employees. These include:

- Recruitment and promotions based on merit, performance, capability, fair employment practices and salary benchmarking.
- Compulsory training for all employees on our Code of Conduct, workplace behaviour policies and modern slavery practices.
- Programs and support for physical and mental wellbeing.
- Availability of flexible workplace arrangements.
- Individual training for all new employees during their induction, ensuring awareness of our policies and initiatives to mitigate modern slavery practices.

These activities and initiatives demonstrate our commitment to upholding a positive work environment, fostering employee wellbeing and maintaining high ethical standards throughout our operations at Growthpoint.

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:

- **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.

Identifying risks in our supply chain

In FY22, we took a proactive step to address potential modern slavery risks within our supply chain by engaging an independent specialist modern slavery consultant. The consultant conducted a data analytics risk assessment aimed at identifying high-risk industries to which the Group may be exposed. This assessment led to a broader examination of potential modern slavery risks throughout our supply chain, resulting in several key findings:

- **Tier 1 supplier low risk:** our Tier 1 suppliers, mainly based in Australia, present a low risk of modern slavery practices.
- **Tier 2 and Tier 3 risks:** most of the modern slavery risks associated with our supply chain exist within Tier 2 and Tier 3 suppliers. This includes suppliers to whom Growthpoint may have direct or indirect links related to potential modern slavery practices.
- **High-risk industries:** the risk assessment confirmed our prior internal findings that our exposure to potential modern slavery primarily stems from high-risk industries such as construction, labour services, subcontractors of construction companies and operational property services.
- **Newly identified risks:** the risk assessment uncovered potential modern slavery risks in previously unidentified high-risk industries within our supply chain, specifically the air conditioning, lifts and escalators sectors.

The key risks associated with the air conditioning, lifts and escalators industries are not necessarily tied to the end products or services provided at our properties. Rather, these risks arise from the importation of products, component parts or raw materials sourced from countries with a higher risk of labour exploitation, deeper within the supply chains.

Since there were no significant changes to our supply chain during the reporting period (as Fortius operates within largely the same supply chain as Growthpoint), the findings of this assessment remain pertinent and relevant to our ongoing efforts to combat modern slavery within our supply chain.

We continue to maintain a low risk rating of modern slavery risks in our supply chain.

The table below shows the correlation between our operating areas and the key risk factors associated with our most significant modern slavery risks in our supply chain.

Operating area	Supply chain area	Nature of engagement	Risk factors
Asset management	Property and facilities management and operations (for example cleaning and security)	Engaged by external property managers on Growthpoint's behalf	<ul style="list-style-type: none"> • Low-skilled occupations • Migrant workforce • Low profit margin • Casual labour • Subcontracting
Development and capital projects	Construction and labour services	Engaged directly by Growthpoint or by external property managers on Growthpoint's behalf	<ul style="list-style-type: none"> • Low-skilled occupations • Migrant workforce • Low profit margin • Casual or subcontracting labour • Tight commercial timelines
	Construction materials	Engaged directly by Growthpoint or by external property managers on Growthpoint's behalf	<ul style="list-style-type: none"> • Low-skilled occupations • Extensive, geographically dispersed, complex and opaque supply chains • Extraction, processing and manufacturing facilities located in jurisdictions with low human rights standards • Low profit margin • Subcontracting of manufacturing processes

Operating area	Supply chain area	Nature of engagement	Risk factors
Corporate operations	Information technology equipment (for example, computers, printers, software and mobile phones)	Engaged directly by Growthpoint	<ul style="list-style-type: none"> • Low-skilled occupations • Extensive, geographically dispersed, complex and opaque supply chains • Extraction, processing and manufacturing facilities located in jurisdictions with low human rights standards • Subcontracting of manufacturing processes

Assessing and addressing risks in our supply chain

Suppliers engaged by our external property managers

Our external property managers are responsible for engaging operational maintenance contractors and suppliers on behalf of Growthpoint. Operational maintenance services are critical to asset management and our business as a professional landlord.

During the year, the MSTF continued to engage and work collaboratively with Growthpoint’s two existing external property managers, CBRE and JLL, to identify and mitigate modern slavery risks of higher-risk services and ensure responsible procurement through due diligence processes. There were no significant changes to CBRE and JLL’s internal policies, approach to identifying suppliers of higher-risk services and their due diligence process as part of onboarding suppliers. Further details of their approach to identifying and managing modern slavery risks for services procured on behalf of Growthpoint can be found in our [FY22 modern slavery statement](#).

Fortius engages the services of three external property managers. Among these managers are CBRE and JLL, which are already working with Growthpoint. The third property manager is Knight Frank, responsible for managing two fund assets. The MSTF conducted a review of Knight Frank’s modern slavery risk management procedures to ensure sufficient controls are in place. Our review indicated that Knight Frank has well documented procedures for managing modern slavery risks in service procurement for Growthpoint similar to the existing regime for Growthpoint’s current property managers. Our review identified these key elements of their risk management procedures:

- **Governance structure:** a modern slavery committee that regularly meets to review action items and monitor progress.
- **Risk assessment:** risk assessments of its supply chain and those managed on behalf of clients like Growthpoint.
- **Due diligence process:** use of the Cm3 system to pre-qualify all service providers, including questions on ethical sourcing and a requirement that high-risk suppliers identified in the risk assessment must complete a detailed modern slavery questionnaire.
- **Whistleblower policy:** a whistleblower policy, an anonymous hotline and a remediation process for reporting of modern slavery grievances.

During the reporting period, we strengthened our due diligence efforts in respect of higher-risk suppliers and following industry discussions on emerging modern slavery risks in the property sector. These enhancements are detailed below.

Lifts, escalators and air conditioning

In our comprehensive FY22 data analytics risk assessment, suppliers operating in the lifts, escalators and air conditioning industries were identified as high-risk entities. Modern slavery risks within these industries stem from the importation of products, component parts and raw materials originating in countries with a higher risk of labour exploitation further down the supply chain.

In response, we worked with our external property managers to request these suppliers complete our modern slavery questionnaire. This initiative aimed to gauge suppliers awareness of modern slavery risks within their own operations and supply chains, as well as identify any policies and procedures for managing these risks. Throughout the year, 88% of relevant suppliers successfully completed the questionnaire, with their responses consistently meeting expected standards for the size and nature of their operations, requiring no further information or clarifications at this stage.

Solar panels

During the year, we implemented enhanced supplier due diligence procedures for the direct procurement of solar panels across our portfolio. Recognising the elevated risk of modern slavery in global solar supply chains, Growthpoint sought additional information from suppliers regarding the place of origin and manufacture of solar panel components, including polysilicon, as part of the tender process.

As a result of the implementation of the enhanced procedures, we elected to procure solar panels from suppliers that could offer information regarding the origins of their components for seven solar projects located in South Australia, Queensland, New South Wales and the Australian Capital Territory. This commitment by Growthpoint indicates how the business at an operational level is seeking to mitigate the risk of modern slavery through active due diligence and factoring material modern slavery risks as a tender consideration.

Due diligence

We continue to use our modern slavery questionnaire to screen directly engaged high-risk suppliers on their procedures to identify and manage modern slavery risks. High-risk suppliers include building management cleaning service providers, building security services providers, providers of services associated with lifts, escalators, air conditioning maintenance and upgrades, providers of solar panels and providers of construction services for contracts valued above \$150,000. The MSTF maintains a register of all questionnaire responses and ensures the active pre-qualification status of each service provider.

As part of the integration of Fortius into the operations of Growthpoint, the funds management business is required to comply with all modern slavery initiatives that Growthpoint has implemented, this includes ensuring all directly engaged high-risk service providers complete the modern slavery questionnaire before contracting.

Monitoring and remediation processes

Growthpoint has implemented grievance reporting and remediation processes to address situations where harm has been caused or contributed to by modern slavery and where our direct link to such harm necessitates our involvement in remediation. 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.

Key aspects of our processes include:

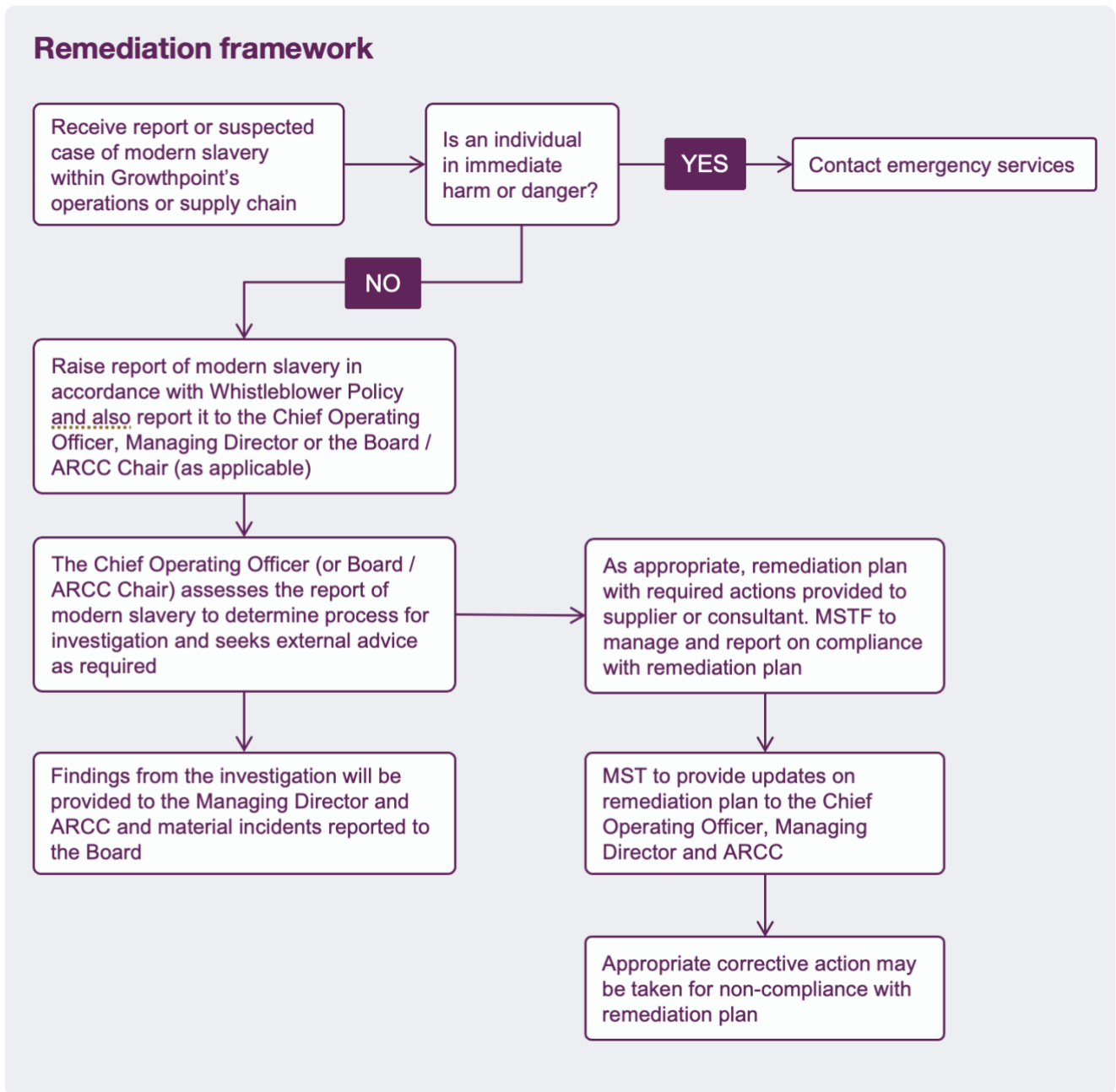
<p>Avenues for reporting</p>	<p>Whistleblower Policy: our policy supports the reporting of misconduct, fraud, inappropriate behaviour, or any improper state of affairs.</p> <p>Code of Conduct: applicable to all officers and employees, it requires the reporting of unlawful and unethical behaviour or breaches of the Code of Conduct.</p> <p>Supply Chain Sustainability Guidelines: these guidelines require suppliers to manage modern slavery risks and promptly notify Growthpoint of significant breaches, allegations of non-compliance, or investigations by authorities.</p>
<p>Process for investigating and remediating</p>	<p>Remediation framework: aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), our framework establishes a transparent, consistent, and a flexible approach for receiving and addressing modern slavery incidents.</p>
<p>Raising awareness</p>	<p>Awareness initiatives: multi-lingual posters displaying information on identifying signs of modern slavery and promoting our whistleblowing hotline are prominently displayed in the back-of-house areas of our office portfolio and corporate offices.</p>

Remediation framework

In FY22, Growthpoint established a framework to address reported modern slavery incidents within our operations and supply chains. This framework outlines procedures for investigating and remediating such incidents, with the response tailored to the level of immediate danger or harm involved.

If a potential modern slavery issue is detected, Growthpoint will take proactive steps to understand the situation and implement necessary remedies, prioritising the safety of the complainant. The appropriate action taken depends on whether Growthpoint is directly responsible for, contributes to, or is linked to the issue through our business relationships.

Our primary focus in all cases is to mitigate the risk of harm to individuals affected and, where relevant, utilise our commercial relationships to enhance employment standards. If a supplier or consultant fails to respond or address compliance issues, including those related to modern slavery, we may consider using our contractual rights, which could include termination.



Incidents

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

Measuring effectiveness

Growthpoint acknowledges that assessing the effectiveness of our efforts to mitigate modern slavery risks is an ongoing and collaborative process involving our entire business and supply chain.

In FY23, we enhanced our approach by introducing an effectiveness framework. Moving forward, we will review, monitor and enhance our metrics to assess the effectiveness of our actions and disclosing performance against our KPIs which are set out below. We recognise the importance of continuous improvement in this regard.

By regularly evaluating our effectiveness, we aim to strengthen our approach to modern slavery risk mitigation and ensure that our actions align with our commitment to combatting modern slavery.

Performance area	How we measure effectiveness	Our KPIs are measured by
Governance	<ul style="list-style-type: none"> Engagement and participation in the MSTF Proactive management of modern slavery risks Keeping the Sustainability Committee and the ARCC appropriately informed Reviews of key policies related to modern slavery 	<ul style="list-style-type: none"> Number of MSTF meetings held Member attendance at the MSTF meetings Number of updates to the Sustainability Committee Completing periodic updates to the ARCC
Responsible procurement	<ul style="list-style-type: none"> Engagement with external property managers on the responsible procurement of suppliers and monitoring of modern slavery risks Property managers effectively implementing their due diligence and pre-qualification processes on behalf of Growthpoint 	<ul style="list-style-type: none"> Completing an annual review of external property manager modern slavery procedures Number of self-reported breaches of the Procurement Plan or Supply Chain Sustainability Guidelines Number of requests for waivers of due diligence pre-qualification
Supply chain engagement	<ul style="list-style-type: none"> Responses to the modern slavery questionnaire for directly engaged suppliers for contract values above \$150,000 Enhanced pre-qualification process for the procurement of solar panels 	<ul style="list-style-type: none"> Percentage of relevant suppliers that complete the modern slavery questionnaire prior to engagement Percentage of solar panel procurement events subject to our enhanced pre-qualification process
Knowledge and awareness	<ul style="list-style-type: none"> Training for employees in procurement focused business units Members of MSTF members attending industry events to understand best practice and new developments 	<ul style="list-style-type: none"> Percentage of required employees that completed modern slavery training Feedback that training provided has improved employees' understanding of modern slavery issues Number of industry events attended by MSTF members
Grievance and remediation	<ul style="list-style-type: none"> An effective grievance mechanism for reporting modern slavery incidents Reports of suspected or actual modern slavery incidents 	<ul style="list-style-type: none"> Number of reported incidents Percentage of remediated reported incidents Effective response to reported incidents

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 Growthpoint’s centralised management, governance and reporting structure, including relevant 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 FY24 and beyond are set out below:

Monitoring and remediation	Disclose performance against KPIs in our effectiveness framework.
Supply chain engagement	Expand targeted risk assessment of suppliers involved in Growthpoint’s decarbonisation strategy, including in connection with solar panels, electric vehicle charging stations and battery storage.
Knowledge and compliance	Provide annual modern slavery training to roles responsible for procurement and expand training to include awareness of how to respond if a grievance arises. Continue ongoing engagement with external property managers on modern slavery information, measures and initiatives.
Governance	Review and update processes for reviewing and reporting modern slavery performance at operational and strategic levels.

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