



# Contents

A message from our CEO and Managing Director .....2

About this statement .....3

Our structure, operations and supply chain .....4

Understanding risks of modern slavery practices in our operations and supply chain .....6

Actions taken to assess and address our modern slavery risks .....9

Assessing the effectiveness of our actions .....14

Other relevant information .....15

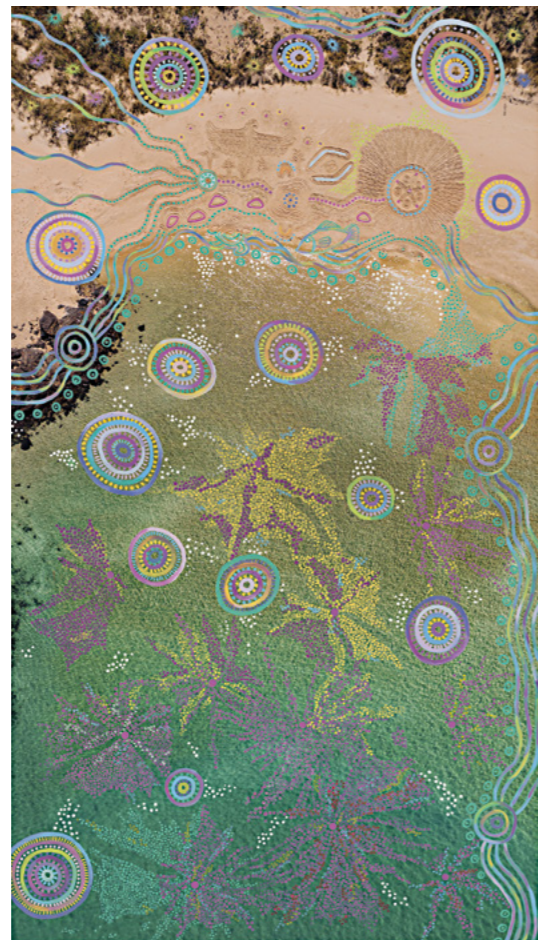
Glossary .....16

The Modern Slavery Statement 2024, forms part of our broader reporting suite. Visit [gpt.com.au](https://gpt.com.au) to read our latest reports and [sustainability.gpt.com.au](https://sustainability.gpt.com.au) to see our new sustainability website.

GPT acknowledges the Traditional Custodians of the lands on which our business operates.

We pay our respects to Elders past, present and emerging, and to their knowledge, leadership and connections.

We honour our responsibility for Country, culture and community in the places we create and how we do business.



Artwork: 'Saltwater Spirit' by Lowell Hunter (proud Nyul Nyul Saltwater man) and Bobbi Lockyer (proud Ngarluma, Kariyarra, Nyul Nyul and Yawuru woman).

## A message from our CEO and Managing Director



At GPT we create experiences that drive positive impact for people, place and planet.

Our fifth Modern Slavery Statement outlines how we continue to strengthen and refine our business processes to identify and guard against modern slavery in our business. **During the reporting period, we did not identify any instances of modern slavery in our operations or supply chain, however, we recognise that this is an ongoing potential risk and will continue to be vigilant.**

Since our last Statement, a particular area of focus has been identifying modern slavery risks within GPT's development operations and capital expenditure projects. To achieve this we have adapted our construction project delivery processes, including implementing product and delivery partner assessment strategies, to enhance due diligence in managing our modern slavery risks.

We continued to leverage the expertise of Australian Red Cross to strengthen our processes and supply chain awareness of modern slavery, adopting an approach that engages with workers in high risk modern slavery sectors associated with our operations. Worker engagement at this practical level creates meaningful consultation and provides us with an understanding of the factors driving exploitation risks, so we can build effective response strategies.

Freedom from slavery is a fundamental human right and we remain committed to work to prevent and mitigate against modern slavery in our operations and supply chain. We recognise that to create long term value, we must build and continue to strengthen trusted relationships with a variety of stakeholders and be accountable for our commitments.

**Russell Proutt**  
Chief Executive Officer  
and Managing Director

### Highlights for 2024

Engaged Australian Red Cross to conduct worker engagement sessions with Retail and Office cleaning and security contractors, to inform recommendations to enhance the effectiveness of GPT's modern slavery response mechanisms.

100% of employees completed our modern slavery e-learning module.

Analysed construction products and sub-contracting risks to inform GPT's procurement procedures, prior to and during project delivery.

Collaborated with co-owners, industry, and cross-sector networks regarding modern slavery due diligence practices.

Completed CAF building certifications at Riverside Centre, One One One Eagle Street in Brisbane, 8 Exhibition in Melbourne; and completed CAF Annual Health Checks at Darling Park and Liberty Place in Sydney, 32 Smith Street, Parramatta and Queen and Collins in Melbourne.

Front cover image: 181 William & 550 Bourke Streets, Melbourne.

# About this statement

GPT Management Holdings Limited (GPTMHL), GPT RE Limited, as responsible entity of the General Property Trust (GPT) and Australian Core Retail Trust (ACRT), and GPT Funds Management Limited (GPTFML), as responsible entity of GPT Wholesale Office Fund (GWOFF) and GPT Wholesale Shopping Centre Fund (GWSCF), prepare and submit this joint Modern Slavery Statement (Statement) pursuant to section 14 of the *Modern Slavery Act 2018* (Cth) (MSA).

The Statement covers GPT’s wholly owned subsidiaries, joint ventures, and managed funds and accounts.

GPTMHL takes the lead in preparing this Statement and consults with the GPTFML Board in its preparation and release. It has consulted with the Board of GPTFM, which is comprised of a majority of directors who are independent of GPT, in the preparation and release of the Statement. For further information regarding our consultation process, see our “Consultation process” on page 14.

The Statement is a summary of the actions taken from 1 July 2023 to 30 June 2024 and those proposed to be taken in the future, to assess and address modern slavery risks in our business. It also includes reference to some actions which have occurred after 30 June 2024. Where such actions have been included, the timing has been noted.

This Statement was approved by the GPT Board on 19 August 2024.

Unless otherwise stated, references in this report to ‘GPT’, ‘Group’, ‘we’, ‘us’ and ‘our’ refer to all the reporting entities joined. All values are expressed in Australian currency as at 30 June 2024.

If you would like further information about this Statement or have any questions or feedback, contact GPT’s Chief Risk Officer at [gpt@gpt.com.au](mailto:gpt@gpt.com.au).

## Reporting entities

The reporting entities for this joint Modern Slavery Statement are as follows:

1. GPT RE Limited (GPTRE), as responsible entity of the General Property Trust and Australian Core Retail Trust (ACRT)
2. GPT Management Holdings Limited (GPTMHL) (together with GPTRE comprising The GPT Group, GPT or Group)
3. GPT Funds Management Limited (GPTFML), as the responsible entity of the GPT Wholesale Office Fund (GWOFF) and GPT Wholesale Shopping Centre Fund (GWSCF)
4. GPT Property Nominees Pty Ltd (GPTPN) as custodian and nominee for the UniSuper direct real estate mandate (UniSuper)
5. GPT Platform Pty Limited as trustee of the M Property Trust (MPT), KSC Trust, KSC Residential Trust 1 (KSC1) and KSC Residential Trust 2 (KSC2), and
6. Marrickville Metro Shopping Centre Pty Limited as trustee of the Marrickville Metro Shopping Centre Trust (MMSCT).

The table below identifies where each criterion, as set out in the *Modern Slavery Act 2018* (Cth), is addressed in this Statement.

|   |            |   |                 |
|---|------------|---|-----------------|
| <b>Criterion 1</b><br>Identify the reporting entity.  | Page 3     | <b>Criterion 5</b><br>Describe how the reporting entity assesses the effectiveness of these actions.  | Page 14         |
| <b>Criterion 2</b><br>Describe the reporting entity’s structure, operations, and supply chains.   | Pages 4-5  | <b>Criterion 6</b><br>Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a statement under section 14 – the entity giving the statement. | Pages 11 and 14 |
| <b>Criterion 3</b><br>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.                            | Pages 6-8  | <b>Criterion 7</b><br>Include any other information that the reporting entity, or the entity giving the statement, considers relevant.  | Page 15         |
| <b>Criterion 4</b><br>Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes. | Pages 9-13 |   |                 |


## GPT’s grievance mechanisms: feedback, help and support

At GPT, we believe that all businesses have a responsibility to respect human rights.



In emergencies, if someone is at risk of immediate harm in Australia call Triple Zero (000).

To report a possible crime of slavery or trafficking call the Australian Federal Police (131 237).

If you’ve experienced slavery or slavery-like conditions, or are worried about someone in this situation, for confidential advice call:

- Australian Red Cross (03 9345 1800), or seek advice via the  [Work Right Hub](#)
- The Salvation Army (1300 473 560)
- Anti-Slavery Australia (02 9514 8115). Translation support is available.

To report wage theft or related workplace issues in Australia you can make an anonymous report via the Fair Work Ombudsman, (13 13 94) or visit [fairwork.gov.au](http://fairwork.gov.au).


Specific information for visa holders and migrant workers is available via  [Fair Work Australia](#) and additional support is available via  [Australian Red Cross Work Right Hub](#).

GPT employees, suppliers, volunteers, and related external parties can confidentially report concerns relating to our operations or supply chain by emailing the Whistleblower Program at [whistleblowerprogram@gpt.com.au](mailto:whistleblowerprogram@gpt.com.au) or by using our secure, confidential, and independent provider, Your Call.



### Your Call can be contacted by:

- **Phone:** 1300 790 228, Monday to Friday between 9am and midnight (AEST)
- **Email:** [gpt@yourcall.com.au](mailto:gpt@yourcall.com.au)
- **Online:** [www.your-call.com.au](http://www.your-call.com.au), click “Make a report” using GPT2019 as the organisation ID.

If you are deaf or have a speech impairment, you can contact Your Call by choosing your contact method via the  [National Relay Service](#) and request Your Call’s hotline, 1300 790 228. If you have difficulty speaking or understanding English, you can access translation support through the Translating and Interpreting Service (TIS) 131 450 and ask for Your Call on 1300 790 228.

# Our structure, operations and supply chain

## Our purpose

# Experience First

We create experiences that drive positive impact for people, place and planet.

## Our values



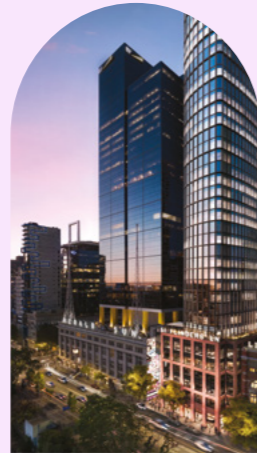
### Everyone counts

People really matter to us. We learn from our differences, and we pull together as one. Life is precious, so safety and wellbeing are our priority, always.



### Imagine if...

We believe anything is possible. We're inquisitive about the world around us and use customer insights to drive the creative and the new. Great questions drive great outcomes.



### Go for it!

We turn ideas into action. We back ourselves and each other. Energy and enthusiasm power everything we do. We're great at getting things done. We're excited to pioneer the firsts that others follow.



### Make an impact

Property impacts our planet in a very real way. So, we act with courage and conviction to make a difference — no matter how big or small. We know a better tomorrow is up to each of us.

Our people are guided by our purpose and values which reflect our commitment to act as a responsible business. This means ensuring our business practices, including our operations and supply chain, protect and respect human rights.

## Our approach to human rights

As a signatory to the United Nations Principles for Responsible Investment (UN PRI), we confirm our commitment to responsible business practices worldwide and leverage our influence to foster sustainable value creation for stakeholders.

Our [Human Rights Statement](#) reflects the United Nations Guiding Principles (UNGPs) on Business and Human Rights and our supporting policies and governance frameworks ensure our environmental, social and governance (ESG) objectives and commitments are integrated in our business decision making.

We recognise the ambition and importance of the United Nations' 17 Sustainable Development Goals (SDGs) and are committed to taking action to advance them. We have identified five priority SDGs in respect of which our business can have the most impact, with Goal 8 – Decent work and economic growth – being the most relevant goal to modern slavery.



Further information on GPT's human rights activities can be found on our sustainability website [sustainability.gpt.com.au](https://sustainability.gpt.com.au).

Each year we submit a public [Communication on Progress \(CoP\)](#) via the United Nations Global Compact (UNGC) website, detailing our actions and commitments to the UNGC's principles.

## Structure<sup>1</sup>

GPT is one of Australia's leading real estate investment managers, with assets under management of \$34.4 billion across a diverse portfolio of high quality retail, office and logistics assets.

The GPT Group (GPT) is a stapled entity comprised of the General Property Trust (the Trust) and its controlled entities and GPT Management Holdings Limited (the Company) and its controlled entities. This Modern Slavery Statement applies to the operations of and suppliers to these entities, including their subsidiary entities.

We undertake the following four core business activities to create value for our stakeholders:

### Investment

Combining property expertise and operational excellence with a deep understanding of the economic drivers and market dynamics of each sector enables GPT to capitalise on opportunities, acquiring and divesting properties at the right time to deliver reliable returns for our investors. Together with our directly held assets, GPT co-invests capital to benefit from the returns that can be derived from high quality core assets in wholesale funds and joint ventures.

### Asset Management

We manage commercial properties in the retail, office, logistics and student accommodation sectors. We apply our portfolio and asset management skills to ensure that we attract, secure and retain tenants, delight and satisfy our customers and visitors, operate efficiently and sustainably, and deliver growing and predictable earnings for investors.

### Development

Our development capability and pipeline enable the creation of new opportunities and enhance the value of our well-located existing properties for the Group and our third-party investors. Our placemaking expertise ensures the properties we design and develop are sustainable and prosperous places for our tenants, customers and communities.

### Funds Management

Our Funds Management platform with \$22.1 billion of funds under management in the retail, office, logistics and student accommodation sectors, leverages our skills and experience to enhance returns for fund investors and capital partners. The Funds Management platform provides the Group with income through fund management, property management and development management fees.

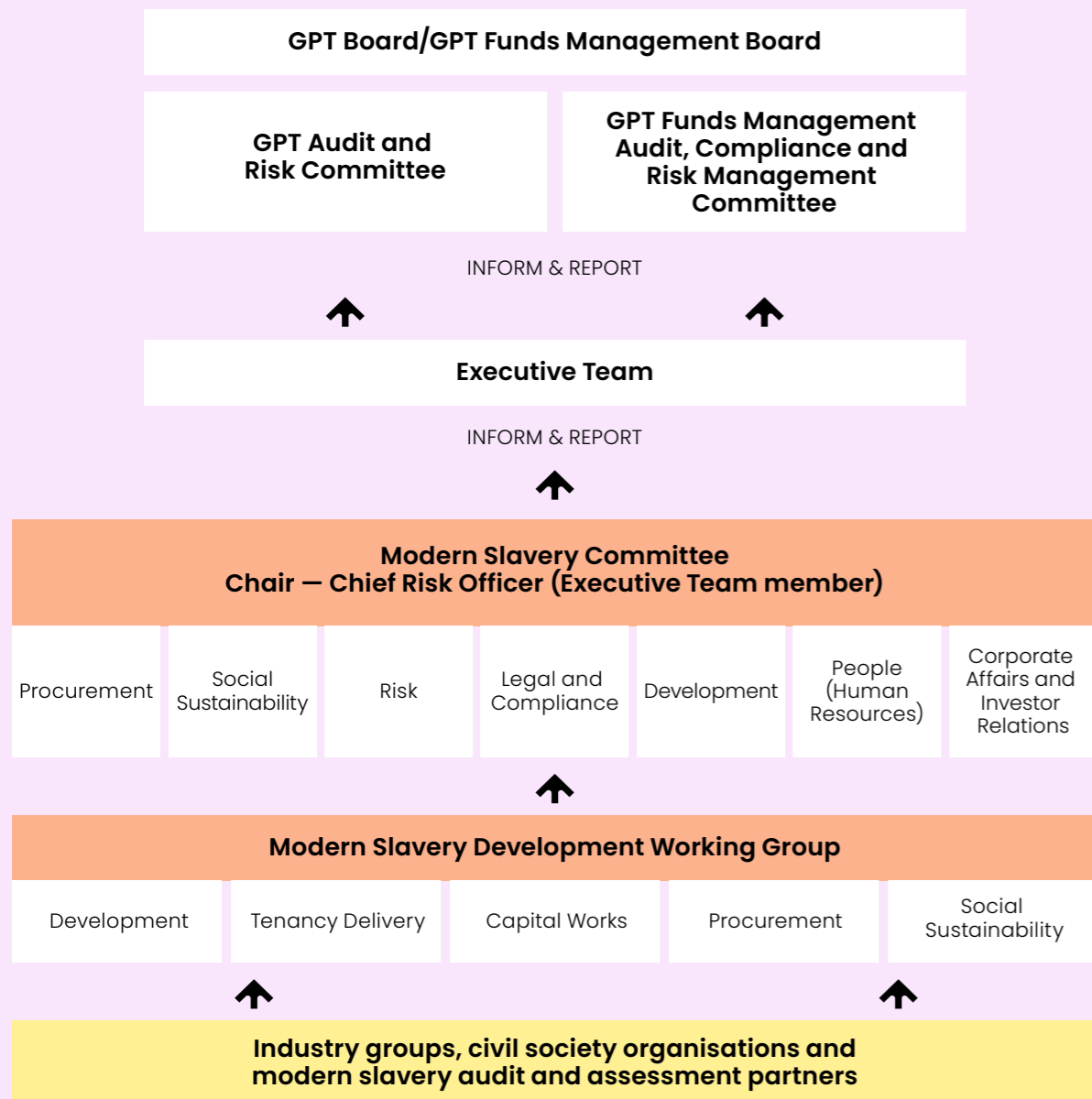
<sup>1</sup> All data is as at 30 June 2024.

# Our structure, operations and supply chain

Continued

## GPT's Modern Slavery Governance Framework

GPT's Modern Slavery Committee is cross-functional to coordinate risk mitigation activities across the Group. Grievances or concerns are escalated as appropriate to senior leadership, including the GPT Board.



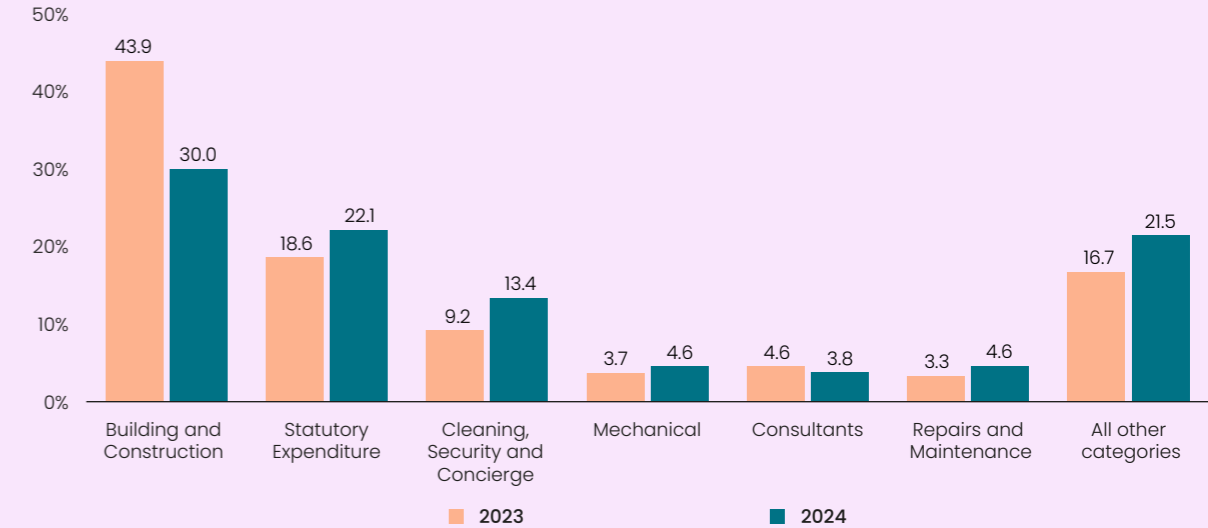
## Our supply chain

GPT sources a wide range of goods and services for our operations and in the 12 months to 30 June 2024 we engaged directly with 2,487 suppliers.

### GPT's top spend by category

GPT has mapped the spend in the reporting period against high risk categories for modern slavery.

### Supply chain spend by category



### Cleaning, Security, Concierge and Maintenance

In 2023, a total of 12 Australian-based cleaning, security, concierge and maintenance contractors were engaged in providing the bulk of these services across our Retail and Office portfolio. The total spend for these contractors amounted to 12.7% of all spend.

Modern slavery risk for these suppliers has been analysed by country, industry and entity risk and six of the 12 contractors have been subject to GPT's independent assessment for modern slavery. This assessment focused on pay, working conditions, rights to work and excessive working hours and included:

- CAF building certification across seven assets relating to two commercial contractors in our Office portfolio
- CAF building certification at Pacific Fair Shopping Centre, QLD relating to one integrated service provider
- Third party, independent assessment across two retail integrated service providers, and
- Third party, independent assessment across two Office portfolio security contractors.

All 12 contractors participated in the Property Council of Australia's modern slavery Informed 365 platform survey, with eight submitting a Modern Slavery Statement as required by the

legislation or voluntarily. All 12 contractors are considered strategic to GPT's operations and are therefore subject to performance and strategic review on a regular basis, including engagement relating to modern slavery.

In 2023, GPT collaborated with Australian Red Cross in a series of worker consultations with our Retail and Office cleaning contractors to better understand the awareness of modern slavery across our contractor workforce. A training program and materials have also been developed for our onsite management teams and contractor workforce. See page 11 for more information.

### Building and Construction related expenditure

In 2023, GPT engaged with 11 Australian-based building contractors who provided building and construction services to the following key projects:

- 51 Flinders Lane, Melbourne Office Development
- 530 Collins, Melbourne (GPT DesignSuites), and capital works
- Riverside Centre and One One One Eagle Street, Brisbane (GPT DesignSuites) and fitout works

- Gateway Logistics Hub Stage 6 and Apex Business Park Stage 1 & 2, and
- Fitout and general capital works across our Retail portfolio.

All 11 contractors participated in the modern slavery questionnaires through the Informed 365 platform or directly with GPT. Of the 11 contractors, five have Modern Slavery Statements as required under the Act or voluntarily. Further modern slavery due diligence during project delivery was also undertaken, particularly relating to procurement activities.

### Outsourced Administration Services

Since 2014, GPT has engaged Genpact to support various administration services. This team is based in Gurgaon, India and GPT conducts a site visit to the Genpact offices at least every three years.

Genpact have completed GPT's supplier onboarding criteria and their policies uphold commitments to freedom of association, eliminating forced labour and human trafficking, inclusive and fair employment, respect, safety and upholding human rights obligations with their own supply chain. See page 6 for more information.

# Understanding risks of modern slavery practices in our operations and supply chain

GPT takes an integrated, enterprise-wide approach to risk management which incorporates culture, conduct, compliance, processes and systems, consistent with AS/NZS ISO 31000: 2018. Our Risk Management Framework guides ongoing human rights due diligence across our business.

In order to understand modern slavery risk across our supply chain and operations, we focus on geographic risk, entity risk, sector and industry risk, and supply chain risk.

## Geographic risk

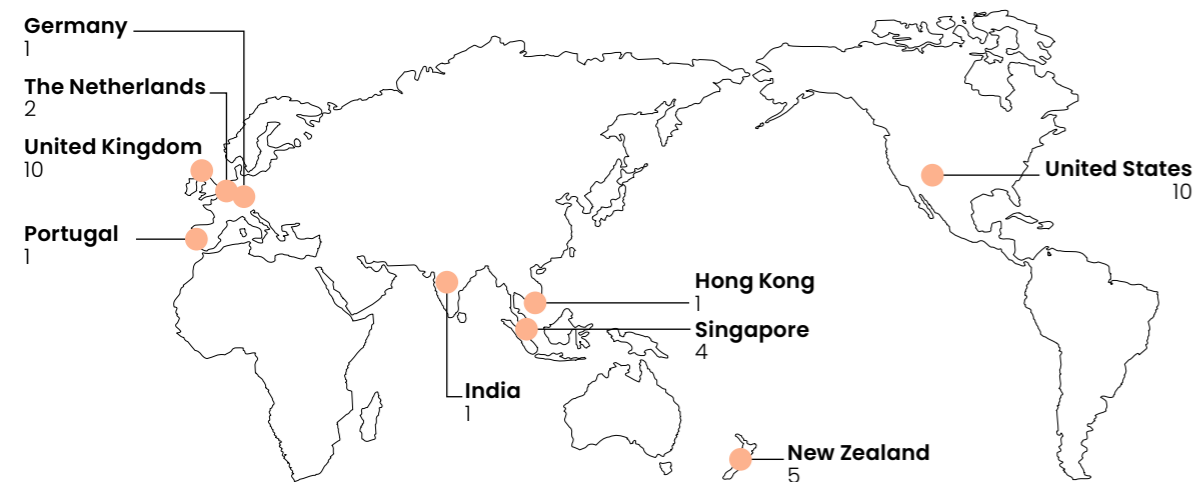
The locations of GPT's direct suppliers are represented on the map below.

Based on the [Walk free Global Slavery Index](#), the highest risk location of GPT's internationally based suppliers is India. GPT outsources some aspects of our administration functions to Genpact Australia, a company legally domiciled in Australia, but with its support team based in India.

GPT recognises that many of our indirectly supplied goods and services may come from other parts of the world that are more exposed and vulnerable to the risks of modern slavery than those from which we directly contract. Our work is ongoing to better understand this indirect risk.

In June and October 2023, GPT employees conducted site visits to Genpact's office to support a positive working relationship with a focus on team engagement, process improvement opportunities and discussions with human resourcing, IT, Learning and Development and Management teams. The visits also provided an opportunity to understand the working environment of the Genpact team and for observational analysis regarding modern slavery indicators. Engagement with the Genpact team has been positive and to date no indicators of modern slavery have been identified or escalated to GPT.

**A total of 35 suppliers to GPT are domiciled in international jurisdictions.**



The number of direct international suppliers to GPT represents 1.4% of all suppliers to GPT. These suppliers provide a combination of professional consultancy services, subscription memberships, outsourced administration services and technology software to GPT and represents less than 1% of all spend.

## Entity risk

GPT recognises that some entities may present a higher risk of modern slavery because they have poor governance structures, high risk business models, and/or poor ethical practices.

GPT has good visibility over our direct contractors, who are required to meet a high onboarding threshold. In GPT's operations and supply chain, entity risk is likely to be higher for smaller, one-off contractors who are not always subject to the same onboarding requirements as our larger contractors and who may lack the resources to adequately identify and address modern slavery risk.

Entity risk is also present where GPT is responsible for managing third party asset and/or development managers. We review the modern slavery risk management practices of external managers using our supplier risk assessment processes and seek feedback regarding modern slavery risk mitigation initiatives (such as CAF audits).

GPT is also represented in development decision making for externally managed assets. This includes ensuring these projects undertake modern slavery due diligence in contractor and product procurement.

## Sector and industry risk

GPT has identified five industries in which workers in our operations and supply chains are most likely to be exposed to modern slavery risk. These are: cleaning, security, building and construction, energy and corporate procurement.

In identifying these industries, we have had regard to the Walk Free Global Slavery Index, input from our partners and advisors (such as Australian Red Cross) and our own materiality and megatrend analysis. GPT will undertake our first human rights salience assessment in 2024.

A detailed assessment of risks faced by workers in these industries can be found in the "Supply chain risk" table on pages "Supply chain risk" on page 7 and 8.

## UNGPs Cause, Contribute and Directly Linked Continuum of Involvement




We have applied the UNGPs on Business and Human Rights *Cause, Contribute and Directly Linked Continuum of Involvement* to understand our role and connection to adverse impacts, and appropriate responses.

|  | Adverse impact  |  |  |
|--|---|--|--|
|  | Degree of involvement   |  |  |
|  | Cause   | Contribute   | Directly linked  |
| <b>Appropriate action: prevention and mitigation</b> | <p>A business can cause modern slavery if their operations are directly engaged in forced labour.</p> <p>For example, GPT could cause modern slavery by engaging in it directly in relation to its own employees.</p> | <p>A business can contribute to modern slavery through their contract arrangements, including the sourcing of labour and materials in its supply chain.</p> <p>For example, GPT could contribute to modern slavery if it put cost restraints on a contractor, who then withholds wages and/or entitlements with its own workforce.</p> | <p>A business can be directly linked to modern slavery through a customer, supplier or investor who uses modern slavery practices in the goods and services it provides.</p> <p>For example, GPT could be directly linked to modern slavery if it engages a supplier who is known to engage in modern slavery.</p> |
| <b>Appropriate action: remediation</b>               | <p>Businesses should cease or prevent the impact.</p>   | <p>Businesses should cease or prevent the contribution and use leverage to mitigate remaining impact.</p>  | <p>Businesses should seek to prevent and mitigate the impact. Appropriate action determined by a range of factors including leverage, how crucial the relationship is, severity, and consequence of termination.</p>   |
|  | <p>Provide for or cooperate in remediation through legitimate processes.</p>  | <p>Provide for or cooperate in remediation through legitimate processes.</p>   | <p>Businesses may take a role in remediation.</p>  |

# Understanding risks of modern slavery practices in our operations and supply chain



Continued

## Supply chain risk

| Sector/industry  | Risk description  | UNGPs Cause, Contribute and Directly Linked Continuum of Involvement assessment   | Key actions to address risk   |
|--|---|---|---|
| <b>Cleaning (services and products)</b>                  | <p>Cleaning is a high risk industry for modern slavery given the widespread use of temporary or unskilled labour and because work is often conducted at night or in remote locations. English is not the native language for many workers in this sector, who are sometimes financially supporting family in other locations, making them particularly vulnerable to the risk of modern slavery.</p> <p><b>Common types of exploitation include:</b></p> <ul style="list-style-type: none"> <li>• Forced or unpaid labour</li> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Deceptive recruitment</li> </ul>  | <p><b>Risk Scale</b></p>  <p>As part of our supply chain, GPT directly engages professional cleaning contractors across our portfolio of owned and managed assets.</p> <p>Labour hire is prohibited and sub-contracting is only permitted with GPT consent. Suppliers are selected after a rigorous tender process which specifically involves consideration of modern slavery risk, including the sourcing of cleaning materials. Continuous supplier performance management and CAF and other independent assessments reduce the likelihood of GPT causing or contributing to modern slavery in this sector.</p> | <ul style="list-style-type: none"> <li>• Supplier assessment during tender and onboarding activities</li> <li>• Supplier assessment through the Informed 365 platform</li> <li>• Contractual reporting obligations, including requirement to report any modern slavery-related grievances</li> <li>• CAF certifications and related actions</li> <li>• Promotion of GPT's grievance channels on site to all workers, and</li> <li>• Through industry and human rights networks, GPT seeks to be informed regarding supply chain modern slavery risks.</li> </ul>  |
| <b>Security (services)</b>                               | <p>Security is a high risk industry for modern slavery given the widespread use of temporary or unskilled labour and because work is often conducted with limited supervision (such as at night) and the industry engages in significant sub-contracting arrangements.</p> <p><b>Common types of exploitation include:</b></p> <ul style="list-style-type: none"> <li>• Forced or unpaid labour</li> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Deceptive recruitment</li> </ul>  | <p><b>Risk Scale</b></p>  <p>As part of our supply chain, GPT engages professional security contractors across our portfolio of owned and managed commercial and retail assets.</p> <p>Labour hire is prohibited, and sub-contracting is only permitted with GPT consent. Suppliers are selected after a rigorous tender process which specifically involves consideration of modern slavery risk. Continuous supplier performance management and regular audits reduce the likelihood of GPT causing or contributing to modern slavery in this sector.</p>  | <ul style="list-style-type: none"> <li>• Supplier assessment during tender and onboarding activities</li> <li>• Supplier assessment through the Informed 365 platform</li> <li>• Contractual reporting obligations, including requirement to report any modern slavery-related grievances</li> <li>• Promotion of GPT's grievance channels on site to all workers, and</li> <li>• Through industry and human rights networks, GPT seeks to be informed regarding supply chain modern slavery risks.</li> </ul>  |
| <b>Building and construction (services and products)</b> | <p>Onsite construction work is undertaken by workers with widely varying skill levels and will often include a high proportion of low-skilled migrant workers. Labour hire practices are common in the industry, with time and cost targets key elements in contracting.</p> <p>Large-scale developments involve significant procurement of building materials (for example, bricks and timber) from many different sources. Global supply chain disruption has increased pressure around materials sourcing, with flow-on impacts to costs and profit margins, which can translate into labour exploitation.</p> <p>Smaller-scale construction or capital works projects also present labour and product risks. Smaller companies engaged on these projects may have less sophisticated policies and procedures to their larger peers, impacting human resourcing and procurement analysis practices.</p> <p><b>Common types of exploitation include:</b></p> <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced or unpaid labour</li> <li>• Unsafe working conditions</li> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Bonded and child labour</li> <li>• Deceptive recruitment, including passport confiscation</li> <li>• Human trafficking</li> </ul> | <p><b>Risk Scale</b></p>  <p>GPT engages builders to undertake construction work at owned or managed sites. Sub-contractors are then engaged by the builders for specialist works. Builders and their sub-contractors procure materials in accordance with specifications agreed by GPT. In some cases, GPT will directly contract builders to undertake smaller projects for repair and maintenance works. GPT may also directly procure fitout materials from time to time.</p> <p>See our case studies on page 13 for more detail.</p>  | <ul style="list-style-type: none"> <li>• Supplier assessment during tender and onboarding activities</li> <li>• Supplier assessment through the Informed 365 platform</li> <li>• Hotspot identification in early phases of project establishment</li> <li>• Contractual reporting obligations, including transparency of supply chain</li> <li>• Regular site visits, project and procurement meetings including the requirement to report any modern slavery-related grievances</li> <li>• Independent modern slavery assessments</li> <li>• Promotion of GPT's grievance channels on site to all workers</li> <li>• Requirements for contractors to report on high risk subcontractors and products, including through the tender process and regular project procurement meetings, and</li> <li>• Through industry and human rights networks, GPT seeks to be informed regarding supply chain modern slavery risks.</li> </ul> |

# Understanding risks of modern slavery practices in our operations and supply chain

Continued

| Sector/industry   | Risk description   | UNGPs Cause, Contribute and Directly Linked Continuum of Involvement assessment  | Key actions to address risk   |
|---|--|--|---|
| <b>Energy (solar panels, batteries and other technologies)</b>  | <p>The production of raw materials and other inputs for the manufacture of solar panels and commercial batteries has been linked to significant human rights abuses in countries with large populations of low-skilled workers, a history of exploitation, including child labour, and weak labour laws.</p> <p><b>Common types of exploitation include:</b></p> <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced or unpaid labour</li> <li>• Servitude</li> <li>• Debt bondage</li> <li>• Child labour</li> <li>• Deceptive recruitment</li> </ul>  | <p><b>Risk Scale</b></p>  <p>GPT has set an ambitious Net Zero Plan that includes goals for carbon neutrality, asset climate resilience and the restoration of nature. Identifying and addressing the risk of modern slavery in the sustainability supply chain is an important part of achieving a just transition to a decarbonised economy.</p> <p>GPT engages suppliers and contractors to provide the products and services which enable us to deliver on these sustainability goals. We will continue to seek improved transparency in this area, which will enable us to better understand where we sit on the continuum. See our case study on page 13 for more detail.</p> | <ul style="list-style-type: none"> <li>• Hotspot identification in early phases of project establishment</li> <li>• Contractor reporting requirements for high risk subcontractors and products, including through the tender process and regular project procurement meetings, and</li> <li>• Engagement in industry and human rights networks, ensuring awareness of specific risks.</li> </ul> |
| <b>Corporate procurement (technology devices such as laptops and smartphones, merchandise, and office supplies)</b> | <p>The production of raw materials for the manufacture of technology devices, including laptops and smartphones has been linked to human rights abuses in countries with large populations of low-skilled workers, a history of exploitation, including child labour, and weak labour laws. Office supplies such as paper, and apparel and general merchandise are typically manufactured in countries with high risk and prevalence of modern slavery.</p> <p><b>Common types of exploitation include:</b></p> <ul style="list-style-type: none"> <li>• Slavery</li> <li>• Forced or unpaid labour</li> <li>• Child labour</li> <li>• Human trafficking</li> <li>• Deceptive recruitment</li> </ul> | <p><b>Risk Scale</b></p>  <p>GPT procures electronic goods, merchandise, and office supplies regularly and undertakes supplier due diligence on Tier 1 suppliers of these products. We recognise the inherent risks that may exist deeper in the complex supply chains attached to these key products and services.</p>  | <ul style="list-style-type: none"> <li>• Hotspot identification in early phases of project establishment</li> <li>• Contractor reporting requirements for high risk subcontractors and products, including through the tender process and regular project procurement meetings, and</li> <li>• Engagement in industry and human rights networks, ensuring awareness of specific risks.</li> </ul> |



Apex Business Park, Bundamba, QLD.



# Actions taken to assess and address our modern slavery risks

GPT continues to assess and take action to address risks of harm to people in our operations and supply chain, through the application of our human rights commitments and modern slavery risk management practices.

GPT's risk management practices incorporate human rights assessments and controls, including modern slavery considerations. Human rights matters are considered in quarterly risk reviews, reporting, investment decisions, supplier onboarding and audits (internal and external).

## GPT's workforce

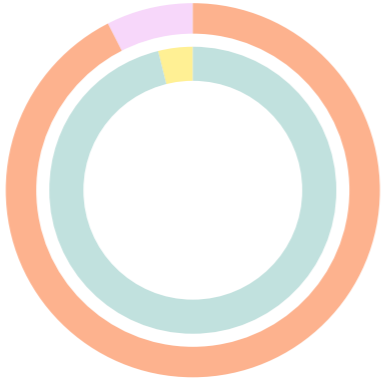
GPT considers that the risk of exploitative labour practices in connection with our direct employees is very low.

GPT directly employs approximately 670 people with most of our direct workforce made up of trained professionals located across Australia, in New South Wales, Queensland, South Australia, Victoria and Western Australia. Each of these jurisdictions has strong employment, workplace health and safety and anti-discrimination laws with which GPT must comply.

All GPT employees are engaged under a formally documented contract of employment and paid in line with or more than the Australian minimum wage.

GPT recognises our employees' right to freedom of association with others, including forming and joining trade unions and all are free to join one and engage in protected industrial activity if they wish to do so. During the reporting period, GPT did not have any employees represented by an independent trade union, that we are aware of, or covered under a collective bargaining agreement.

### Workforce breakdown by employment type:



- Full time 92.5%
- Part time 7.5%
- Permanent 96.2%
- Fixed term 3.8%

GPT's annual 'Your Voice' Engagement Survey allows employees to provide feedback on what it is like to work at GPT. In 2024, 88% (2023: 86%) of our employees participated in this survey. Results indicated that 89% (2023: 89%) of those surveyed would recommend GPT as a great place to work.

Importantly, 100% (2023: 99%) of employees were aware of GPT's Whistleblower Policy and 81% (2023: 80%) of employees feel comfortable to speak up.

In response to a specific question included on modern slavery, 97% (2023: 90%) of employees would know who to contact in the event they suspected modern slavery was occurring at GPT or in GPT's supply chain.

## Policies and procedures

GPT has various mechanisms in place, including policies, procedures, frameworks and strategies that underpin our approach to address modern slavery, including how we work and how we engage with our stakeholders.

We monitor risk areas and undertake regular reviews of our various mechanisms to ensure that they reflect the current Australian legislation and best practice in relation to human rights.

A detailed list of our policies can be found in 'Other relevant information' on page 15 of this report.

During the reporting period GPT did not have any modern slavery related breaches of policy.



580 George Street, Sydney.

# Actions taken to assess and address our modern slavery risks

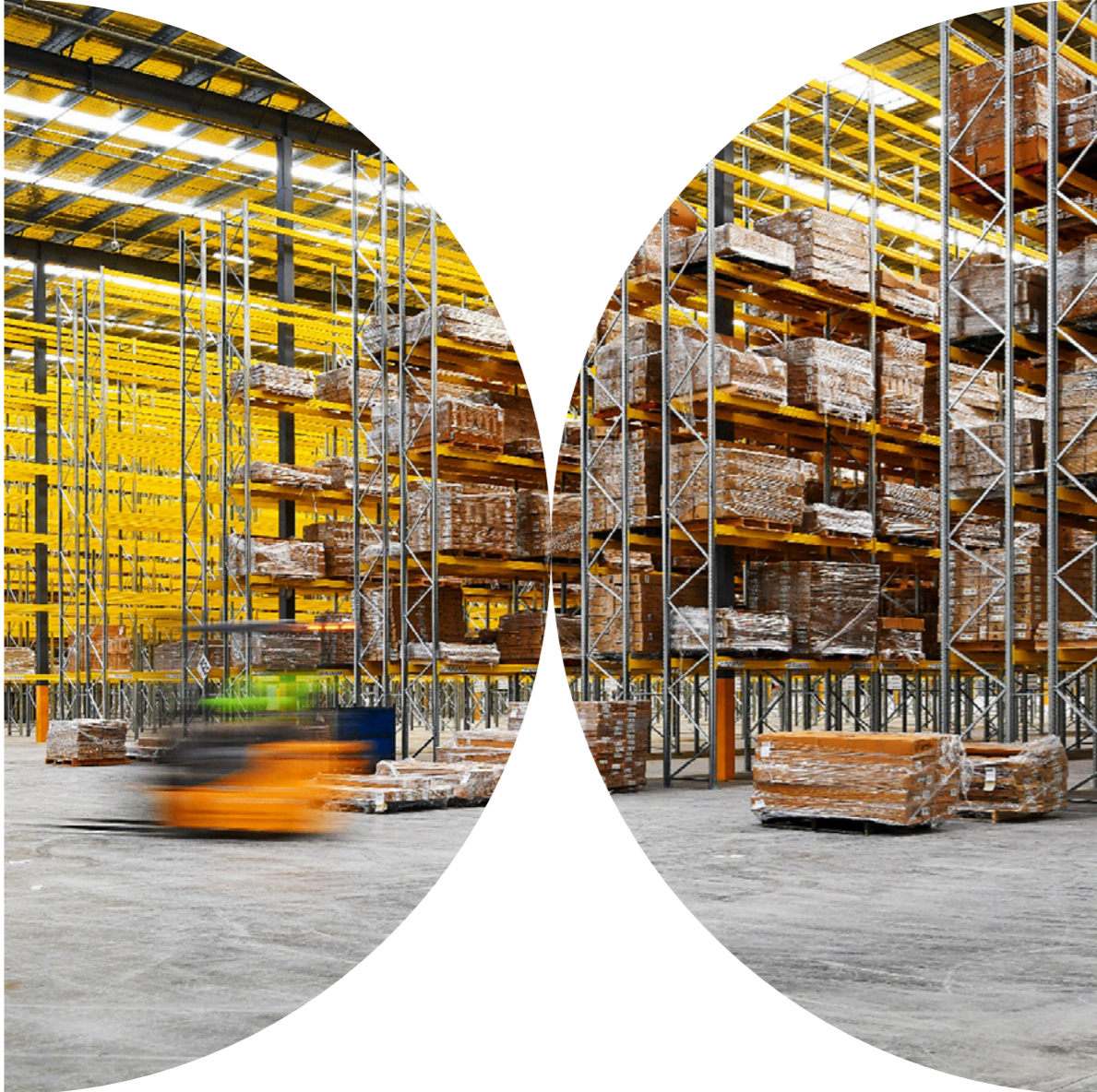
Continued

## Our supply chain

Since 2019, a cross-functional program of work has been ongoing to improve processes to assess and address the risk of modern slavery in our indirect workforce across our supply chain.

The focus of the program is on four key areas:

1. Identify GPT's highest potential exposure to modern slavery practices.
2. Map existing controls and consider how these can be improved.
3. Undertake risk based, independent assurance.
4. Collaborate and engage with industry partners and networks.



1 Hurst Drive, Tarneit VIC.

### 1. Identify GPT's highest potential exposure to modern slavery practices

#### Alignment of approach with our supply chain

GPT creates long term partnerships with suppliers whose policies, values and cultures complement our own and meet our high standards.

We seek to collaborate with suppliers to ensure ongoing compliance with GPT's requirements and our Code of Conduct, with several cleaning contractors in our Commercial Office buildings already exceeding industry wage standards.

Existing principles outlined in our service agreements (such as fair work principles, rewards and loyalty program, ethical standards, and One Team approach) have influenced independent certifications such as CAF.

#### Supplier screening and onboarding

In 2024, 67 of GPT's 107 Priority A suppliers were asked to complete a modern slavery risk questionnaire using the Property Council's Informed 365 platform with a response rate of 94%. If we do not receive a response, a high-level risk assessment is conducted and follow-up, as necessary.

Survey responses such as this help assess modern slavery risk, alongside factors like supplier location, industry, audits and feedback. While supplier spend is also considered, we recognise that it is not determinative of modern slavery risk to individuals in our supply chain.

### 2. Map existing controls and consider how these can be improved

#### Engagement of suppliers

GPT's weighted supplier pre-qualification survey (ESG, corporate, risk) ensures only qualified vendors – as assessed by our Procurement Working Group and after meeting minimum ESG benchmarks – compete for high and medium value tenders.

If successful, a service agreement is entered into explicitly stating that the supplier must:

- Adhere to GPT's Supplier Code of Conduct
- Comply with all laws, including those relating to modern slavery and labour practices, and human rights
- Not subcontract without GPT's consent
- Notify GPT of any potential breaches of which they become aware, and
- Agree to GPT conducting independent assurance programs to ensure compliance with our Supplier Code of Conduct.

Cleaning suppliers in our Retail portfolio must also adhere to the Shopping Centre Council of Australia's Code of Conduct for Fair Service Provision in Shopping Centres (including fair wages, working conditions, freedom of association) in alignment with GPT's ethical sourcing policies.

For high risk products like solar panels, GPT actively assess supplier practices to combat modern slavery. See case study on page 13.

#### Supplier management

Our digital supplier management system, Felix, streamlines registration and ongoing management. Suppliers complete an onboarding questionnaire covering ESG, compliance (including privacy, health and safety), and upload compliance documents through the system.

Screening questions relating to modern slavery assess:

- Submitted Modern Slavery Statements
- Approach to diversity and inclusion, including related policies and practices
- If employees are free from all types of exploitation
- Procedures prohibiting all forms of abuse, and
- Supplier grievance and remediation processes.

GPT conducts monthly and quarterly reviews of key contracts, assessing supplier performance and modern slavery due diligence.

High risk strategic suppliers face additional quarterly reviews with targeted questions on supply chain changes, their own modern slavery reviews, complaints received and training conducted.

#### Grievance mechanisms and remediation processes

GPT's Modern Slavery Response Procedure outlines how we receive, address, and potentially remedy modern slavery concerns, complaints, and incidents. It includes the following key mechanisms for complaints:

- Whistleblower Policy, via either the:
  - Whistleblower Program, or
  - Independent whistleblowing service provider, Your Call
- Internal Grievance Policy, for employees
- Directly to a member of the Modern Slavery Committee, and
- GPT's website, a direct portal for feedback and outlines complaints mechanisms specific to investors and privacy.

Our Response Procedure aligns with the UNGPs, UNGC, and Global Reporting Initiative (GRI) Standards, ensuring a legitimate, accessible, and equitable process for addressing modern slavery concerns.

The Procedure also adapts to each potential instance of modern slavery, prioritising risk assessment and tailored action for the impacted stakeholder(s).

See our case study on page 11 for our engagement with Australian Red Cross to review the effectiveness of GPT's grievance mechanisms and how we are implementing their recommendations.

# Actions taken to assess and address our modern slavery risks

Continued

### 3. Undertake risk based, independent assurance

GPT continues to expand our modern slavery assurance program through our engagement with Informed 365, CAF, Property Council of Australia and independent consultants. GPT has built a program of assessment since 2019, across our Retail and Office portfolio, covering cleaning, security and maintenance.

#### Focus areas of the program:

- Employee rights to work
- Correct award
- Hours worked
- Grievance policies and procedure, and
- Remediation policies and procedures.

#### Key improvements made through the program:

- Improved grievance and whistleblower processes and communication of these channels to workers, based on worker feedback
- Improved remediation processes
- Re-training and revised training content for GPT employees and onsite contractor teams
- Improved worker awareness of modern slavery and channels for reporting concerns
- Greater awareness of modern slavery risk indicators in the cleaning and security sectors, and
- Back pay for employees that have not been paid the correct allowances or have been mis-classified under the award.

### Bringing a lived-experience to our supply network with Australian Red Cross

Unearthing and tackling modern slavery requires worker participation. However, for high risk groups like low-skilled migrant workers, building trust and fostering open communication channels can be particularly challenging. The fear of retaliation, including job loss, visa issues, or even deportation, often silences workers, making it difficult for them to report abuses.

To gain input from workers in GPT's high risk groups, we have partnered with Australian Red Cross and leveraged their extensive expertise in supporting victim-survivors of modern slavery to help improve our processes for identifying and responding to modern slavery risks.

By adopting an approach consistent with the United Nations Guiding Principles on Business and Human Rights and leading practice guidelines, Australian Red Cross engaged cleaning and security workers across our Retail and Office sectors. This involved a series of activities that took place in 2023, including:

- Four interactive workshops with cleaning, security and guest experience staff across multiple sites and contractors, to understand workers' ability to identify modern slavery risks they may experience or observe, and their willingness to engage with reporting channels. Data was collected from workshop participants via a brief survey at the beginning and end of each workshop, and all participants reported an increase in understanding and awareness
- An interactive scenario-based workshop with GPT's Modern Slavery Committee, to test our Modern Slavery Response Procedure and build our capability to respond to grievances effectively, and
- Reviewing GPT's modern slavery governance documents, grievance and response procedures and learning module.

Following these workshops, we are adopting a range of recommendations to improve our grievance mechanisms and Modern Slavery Response Procedure; improve the communication of our grievance channels; and enhance our learning and development activities with our employees and high risk suppliers.

In late 2024, GPT will hold another workshop with Australian Red Cross and GPT's cleaning and security contractors to discuss the findings and explore opportunities for collaboration to further enhance worker awareness of modern slavery and their work rights.

Effective consultation, with the support of Australian Red Cross, is important as we mature in our approach to identifying and responding to modern slavery risk. Worker engagement at this practical level supports us in building more effective response strategies and helps us gain a deeper understanding of how we can mitigate exploitation risk in our supply chain.



# Actions taken to assess and address our modern slavery risks

Continued



Highpoint Shopping Centre, VIC.

## 4. Collaborate and engage with industry partners and networks

GPT engages with and participates in the following industry groups and civil society organisations to further our understanding of modern slavery risks and determine appropriate responses.

| Organisation   | Overview and engagement activities   | Regularity                                    |
|--|--|---|
| <b>Australian Council of Superannuation Investors (ACSI)</b>                         | ACSI assesses the quality of ASX200 companies' modern slavery statements under the <i>Australian Modern Slavery Act 2018 (MSA)</i> , and GPT has incorporated feedback from these assessments into our reporting practices. GPT reviewed insights from the ACSI following its inaugural modern slavery forum in March 2024.  | Every two years                               |
| <b>Australian Red Cross</b>  | Since 2022, GPT has been working with Australian Red Cross to further advance our grievance and worker engagement practices. See adjacent case study for more detail.  | Regular project meetings, at least bi-monthly |
| <b>Cleaning Accountability Framework (CAF)</b>                                       | CAF is a multi-stakeholder organisation that exists to end exploitation in property services and improve labour standards through education and advocacy. GPT has been a member of CAF since 2021 and works with the organisation in a spirit of cooperation to drive responsible standards for the procurement, management and delivery of cleaning services. This occurs through CAF Certification, a worker-centric due diligence mechanism that assesses, addresses, and mitigates the risk of labour exploitation by engaging workers and other supply chain stakeholders.<br><br>As a CAF Member, GPT works alongside procurers and providers of contract cleaning services, worker representatives, government regulators and academic subject matter experts to address modern slavery risks in the cleaning industry.   | Every three months                            |
| <b>Property Council of Australia (Property Council) Modern Slavery Working Group</b> | In addition to contributing to responses to the Modern Slavery Act review, GPT has participated in the development of a range of resources published by the Property Council since 2022. These include: <ul style="list-style-type: none"> <li>🔗 <a href="#">Listening and Responding to Modern Slavery in Property &amp; Construction Practical Guide</a></li> <li>🔗 <a href="#">Remediating Modern Slavery in Property &amp; Construction Guide</a></li> <li>🔗 <a href="#">Pathway to Respecting Human Rights and Addressing Modern Slavery Risks Guide</a></li> </ul> The Working Group also hosted various guest speakers and subject matter experts to further understand modern slavery risks and issues in 2023-24. In May 2024, through the Property Council network, GPT joined the Informed 365 & Better Sydney roundtable event in Sydney "Understanding Modern Slavery in our Supply Chains – Tier 2 and Beyond". In writing this statement, GPT has also reviewed the modern slavery statement feedback provided by four independent experts at a Group Feedback Session facilitated by this PCA working group. | Monthly                                       |
| <b>UN Global Compact Network of Australia (UNGCA)</b>                                | GPT's annual public 🔗 <a href="#">Communication on Progress</a> submission details our actions and commitments to the UNGC's principles. GPT also participates in the UNGCA's Modern Slavery Community of Practice (in the Optimising stream) which provides up-to-date information from a cross-section of public, private, and civil society organisations in Australia and beyond. During the reporting period, this has focused on assessing the effectiveness of grievance mechanisms, and implementing effective human rights due diligence. In 2024, GPT joined the UNGCA's Human Rights Due Diligence Working Group to further enhance our risk management practices. GPT also regularly attends UNGC events and participates in formal learning activities hosted by the Australian and Global networks.  | At least quarterly                            |
| <b>NSW Anti-slavery Commissioner Forum</b>   | In May 2024, GPT was a panellist at the NSW Anti-slavery Commissioner Forum held in Sydney, discussing Modern Slavery in the cleaning industry and the link that procurement plays in assessing and managing the risks of modern slavery.  | Ad hoc  |

# Actions taken to assess and address our modern slavery risks

Continued

## Development Working Group

The Development Working Group is a cross-functional group that reports into the Modern Slavery Committee, formed to assess and address the risks of modern slavery arising from GPT's development and capital expenditure projects.

A Modern Slavery Strategic Action Plan was established in 2022 to inform our actions against seven identified focus areas. Our progress during the reporting period is set out in the table below.

| Focus area                                   | Goal   | Action during the reporting period  |
|--|--|---|
| <b>Policy awareness</b>                      | Consistently well understood and applied   | All relevant employees participated in a refresher learning module. Employees report an increasing understanding of risks and management actions they hold responsibility for.  |
| <b>Procedures</b>                            | Established and adopted across all developments  | Established modern slavery risk management actions against each phase of GPT's Development Framework and capital expenditure project delivery procedures ensuring effective processes are adopted in the selection of quality delivery partners and products, including addressing GPT's expectations and requirements within project documentation and ongoing project management. |
| <b>Contracts</b>                             | Influential and industry-leading for our delivery partnerships   | Contracts include the ability to conduct audits. For example, GPT team members visited a manufacturing site for the 51 Flinders project with construction partner Lendlease in 2023. See adjacent case study for more detail.   |
| <b>Training and education</b>                | Frequent skilling to allow our Management team to be equipped to create leading influence  | All GPT staff completed GPT's compulsory modern slavery e-learning module. Development team members attended a workshop with modern slavery legal specialist, Luke Geary from Mills Oakley.   |
| <b>Initiatives and advocacy</b>              | Demonstration of our commitment to modern slavery with initiatives and advocacy across the spectrum of management to influence positive outcomes | GPT is collaborating with Australian Red Cross and other industry partners to develop an observational checklist and other communication material that could be adopted by the construction sector to enhance identification of risk indicators.  |
| <b>Partnerships</b>                          | Adoption of partnerships to leverage modern slavery messaging to achieve our strategic outcomes and activities                                   | Took insights from construction partners processes and templates to inform our modern slavery risk management actions and processes, against each phase of GPT's Development Framework.   |
| <b>Assessment, assurance, and monitoring</b> | Demonstrated progress and third-party verification   | GPT has engaged a third party to review our identified high risk construction materials and related procurement procedures.   |

## Building an ethical supply chain: 51 Flinders Lane

By engaging and collaborating with our suppliers, GPT can leverage supply chain knowledge, particularly in high risk regions and emerging areas of concern. This mitigates risks during procurement and ensures our supply chain meets our ethical, environmental and sustainability standards. One example is our activities with Lendlease, the design and construction contractor on our 51 Flinders Lane development.

In October 2023, representatives from our 51 Flinders Lane Development team, the Lendlease project team, the resourcing consultant SRG and its supplier Trinity Windows conducted a site visit to Golden Aluminum's factory in the Chinese province of Guangdong. The purpose of the visit was to evaluate Golden Aluminum's façade and glazing products for the project, as these materials are often linked to an increased risk of modern slavery.

The teams explored the facility, observing the factory floor, office area, and staff kitchen and dining area, gaining valuable on-the-ground insights, including an opportunity to assess operations and labour practices. No modern slavery concerns were identified through this site visit.

Site visits and engagement activities of suppliers deeper in our supply chain, like Golden Aluminum, are important to test our procurement assumptions and strengthen our understanding of potential and actual risks.



## Understanding risk in renewable energy equipment

To continue our understanding and assessment of modern slavery risks relating to solar panel procurement, our Logistics Development team attended a site visit in early 2024 at Australian based designer and manufacturer, Tindo Solar, who have been producing solar panels in Adelaide since 2011.

By manufacturing their solar panels in South Australia, Tindo Solar ensures strict quality control processes are implemented, providing visibility throughout their supply chain. The site visit provided an opportunity for our Development team to assess these practices firsthand and see how Tindo Solar panels might be suitable for our future developments.

The team's visit confirmed that Tindo Solar are actively seeking to maximise the percentage of locally sourced materials in their solar panels.

Assessing human rights risks associated with our decarbonisation goals is a priority action area for GPT and we will continue to enhance our assessment and management practices in relation to these actions.



# Assessing the effectiveness of our actions

## GPT’s Modern Slavery Committee plays an important role in measuring the overall effectiveness of our actions to address modern slavery risks.

The composition of the Committee and the related Development Working Group is set out in GPT’s Modern Slavery Governance Framework diagram on page 5.

### Monitoring and overseeing

The Modern Slavery Committee plays an essential role in monitoring GPT’s modern slavery by:

- Regularly reviewing risk assessment processes to ensure they remain effective
- Providing regular engagement and feedback between key functions
- Overseeing modern slavery audits and monitoring of specific steps taken to address modern slavery risk
- Tracking actions taken and measuring the impact of our actions
- Reviewing the effectiveness of GPT’s modern slavery controls and providing a forum for regular engagement and feedback, and
- Responding to modern slavery concerns and/or complaints.

Key activities of the Modern Slavery Committee during the reporting period included:

- Advancing action and engagement with GPT’s construction supply chain through the Development Working Group, as outlined on page 13
- Adopting recommendations from Australian Red Cross, including to enhance GPT’s Modern Slavery Response Procedure and compulsory e-learning module, and to enhance the accessibility of GPT’s grievance mechanisms

- Coordinating tailored learning activities for employees with direct modern slavery risk management responsibilities
- Monitoring supplier completion of modern slavery-related questions in GPT’s supplier onboarding requirements, and in the Property Council’s Informed 365 supplier questionnaire
- Assessing and adopting recommendations that derive from the modern slavery independent program
- Endorsing the modern slavery independent assessment program for the year, and
- Ensuring the ACRT and UniSuper mandates and asset co-owners were informed of GPT’s activities and key learnings.

### Consultation process

GPT provides investment and/or property management services to GWO, GWSCF, UniSuper and ACRT. GPT has consulted with each of these entities in the process of preparing this Statement.

In particular, reports are provided to the GPT Board and to the GPT Funds Management Board Audit, Compliance and Risk Management Committee at least annually in relation to GPT’s activities to combat modern slavery. Additionally, both committees receive a draft of the GPT Modern Slavery Statement for review, prior to publication. Reporting on complaints received and remediation is provided throughout the year.

### Key performance indicators

GPT has identified several key performance indicators (KPIs) which will assist in assessing the effectiveness of our efforts to address modern slavery. It is anticipated that these KPIs will evolve as GPT gathers increasing data about modern slavery and as we further develop our supply chain assessments.

| Focus area                                     | KPI’s for the reporting period  | 30 Jun 23 | 30 Jun 24 | Next steps: 2024 onwards   |
|--|---|-----------|-----------|--|
| <b>Governance and compliance</b>               | GPT Modern Slavery Committee meetings held quarterly  | 4         | 4         | Review GPT’s modern slavery consultation processes with co-owners and embed in governance framework.   |
|  | GPT Modern Slavery Development Working Group meetings held  | 6         | 6         |  |
| <b>Training and communication</b>              | GPT employee compulsory modern slavery training completion rate   | 100%      | 100%      | Host tailored learning sessions with Asset Management, Development, Capital Expenditure and Tenancy Delivery teams regarding modern slavery risk management practices.   |
| <b>Supply chain</b>                            | Independent modern slavery audits/ assessments of Priority A suppliers  | 3         | 3         | Host workshop with high risk contractors and Australian Red Cross to embed worker voice in grievance channels and enhance effectiveness of grievance channels.<br>Expand the CAF certification program.<br>Expand GPT’s risk assessment to include high risk indirect suppliers.                   |
|  | Percentage of GPT property managed and/or owned assets independently assessed/audited                           | 79%       | 53%       |  |
|  | Supply chain worker grievances  | 0         | 5         |  |
|  | Findings of modern slavery arising from the GPT independent audit/assessment program                            | 0         | 0         |  |
|  | Priority A supplier Property Council and GPT Modern Slavery Questionnaire completion rate                       | 94%       | 94%       |  |
| <b>Partnerships and stakeholder engagement</b> | Property Council Modern Slavery Committee meetings attended   | 9         | 8         | Enhance awareness of modern slavery reporting and escalation process to Australian authorities.<br>Participate in industry, civil society, and government collaboration initiatives to enhance risk identification and mitigation efforts in construction supply chains, and grievance mechanisms. |
|  | UN Global Compact Network of Australia Modern Slavery Community of Practice meetings attended                   | 2         | 1         |  |
|  | UN Global Compact Network of Australia Human Rights Due Diligence network meetings attended (commenced in 2024) | N/A       | 2         |  |

# Other relevant information

## Related GPT policies and procedures

GPT has established policies and procedures that govern how we operate. These policies are regularly reviewed through internal and external consultation with relevant stakeholders to confirm their relevance and approach. Some of these policies are available on GPT's website at [www.gpt.com.au/about-us/corporate-governance/policies](http://www.gpt.com.au/about-us/corporate-governance/policies).

The policies that are relevant to how GPT manages potential human rights and modern slavery issues include:

| Policy/Procedure   | Relevance to modern slavery   | Date last issued | Policy implementation  |
|--|---|------------------|--|
| <b>Anti-Bribery, Fraud and Corruption Prevention Policy</b>      | Fraud and/or corruption, including bribery, in all forms are behaviours that are contrary to GPT's values and culture. GPT is actively committed to preventing fraud and corrupt conduct throughout the organisation.   | May 2024         | Published on the GPT website. All employees receive annual training on this policy and related behaviours. The Board is informed of any material breaches via the Audit & Risk Committee and GPT also discloses any material issues.   |
| <b>Code of Conduct</b>   | A framework around the standard of behaviour expected of all GPT directors and employees, ensuring GPT and our people are never involved in any form of illegal or unethical conduct, or any situation of activity which might be perceived by others as illegal or inappropriate.  | May 2024         | Published on the GPT website. All employees receive training on the Code of Conduct as part of their onboarding and routine refresher training thereafter. The Board is informed of any material breaches of the Code of Conduct via the Human Resources and Remuneration Committee. GPT also discloses reports under the Code of Conduct in its Sustainability Data Dashboard, including the organisational response. |
| <b>Grievance Policy</b>  | Sets out our approach to providing a safe and harmonious work environment and provides a guideline to facilitate the resolution of complaints, grievances or problems raised by employees.  | October 2023     | Published on the GPT website and shared with all employees.  |
| <b>Human Resources and Remuneration Committee (HRRC) Charter</b> | The HRRC was established by the Board to assist the Board in overseeing people and remuneration related strategies, policies, frameworks, and practices.  | May 2024         | Published on the GPT website and shared with all employees.  |
| <b>Human Rights Statement</b>                                    | Affirms our established commitment to respect and uphold human rights, being those set out in the International Bill of Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.  | July 2023        | Published on the GPT website and shared with all employees, including through our annual modern slavery e-learning module.   |
| <b>Modern Slavery Committee Charter</b>                          | The Modern Slavery Committee Charter was established by the GPT Board to assist in the oversight of GPT's human rights and modern slavery approach.   | June 2024        | Internal policy for GPT employees.   |
| <b>Modern Slavery Governance Plan</b>                            | The Modern Slavery Committee's Governance Plan sets out the oversight framework for modern slavery matters at GPT.  | June 2024        | Internal plan for GPT employees.   |
| <b>Modern Slavery Response Procedure</b>                         | Sets out the specific mechanisms for receiving and addressing modern slavery concerns, complaints, and incidents and, if appropriate, how we may provide a remedy for the impacted stakeholder(s).  | June 2024        | Internal procedure that is shared with all employees, including via GPT's annual e-learning module.  |
| <b>Privacy Policy</b>  | Sets out our practices relating to privacy to ensure all personal information collected by GPT is handled in line with legal and regulatory requirements. We recognise individuals have a right to understand these practices, and a right to have access to the personal information we hold about them. We also acknowledge some personal information is sensitive and only collect this with express consent of the individual and in accordance with the Privacy Act.   | May 2024         | Published on the GPT website and shared with all employees.  |
| <b>Procurement &amp; Expense Management Policy</b>               | Sets out how we source goods and services efficiently and fairly, whilst complying with all applicable legislation and conforming to our ethical, environmental and sustainability standards. The Policy applies to every aspect of GPT's business, including large developments, small-scale capital projects and the supply of goods and services to GPT's assets.  | March 2024       | An internal policy for GPT employees. Employees are advised of updates to the Policy as and when they occur.   |
| <b>Supplier Code of Conduct</b>                                  | Forms part of our contractual arrangements with suppliers and outlines GPT's expectations regarding our suppliers' activities in the production and delivery of goods and services to us. Non-compliance may allow us to terminate our relationship with a supplier. The Supplier Code of Conduct supports GPT's values, purpose, and strategy, as well as internationally recognised standards and appropriate codes of practice. The Supplier Code of Conduct also requires suppliers to adopt similar principles in dealing with their own suppliers and to adhere to acceptable business practices, including timely payment. | May 2024         | Published on the GPT website. Suppliers are required to achieve and maintain the minimum standards outlined in the Supplier Code of Conduct and must train employees and contracted parties on their rights and responsibilities. This includes addressing risks of harm to people and planet.   |
| <b>Supplier Policy</b>   | Sets out our expectations for all suppliers of goods and services to GPT, whether local, national, or international in relation to human rights and responsible sourcing, including modern slavery. This Policy should be read in conjunction with GPT's Supplier Code of Conduct.  | Dec 2023         | Published on the GPT website. All suppliers participate in a comprehensive Supplier Pre-qualification Survey and ongoing compliance monitoring and improvement, and supplier performance is regularly monitored.   |
| <b>Whistleblower Policy</b>                                      | Describes key elements of our Whistleblower Program, including how to make a whistleblower report, who to report to, how it will be addressed, and the protections and support available, including confidentiality and protection from victimisation.  | April 2023       | Whistleblower posters are displayed across all GPT's owned and managed assets. All employees receive Whistleblower training on commencement of employment with GPT and routine refresher training thereafter. Additional training is provided to those who have roles and responsibilities under GPT's Whistleblower Framework.  |

# Glossary

| Term  | Meaning   |
|---|---|
| ACRT  | Australian Core Retail Trust  |
| Australian Red Cross                                  | Australian Red Cross, formally Australian Red Cross Society, is a humanitarian aid and community services charity in Australia.   |
| Cleaning Accountability Framework (CAF)               | An organisation focused on improving labour practices and eliminating exploitation in the cleaning industry through worker-driven engagement <a href="http://www.cleaningaccountability.org.au">www.cleaningaccountability.org.au</a>   |
| Funds   | GPT Wholesale Office Fund or GPT Wholesale Shopping Centre Fund   |
| GPT   | The GPT Group   |
| GPTFM   | GPT Funds Management  |
| GPTMH   | GPT Management Holdings   |
| GRI   | Global Reporting Initiative is an independent international organisation that provides organisations with the widely used standards for sustainability reporting, the GRI Standards <a href="http://www.globalreporting.org">www.globalreporting.org</a>  |
| Human rights  | Human rights are rights that apply to all human beings. They are universal and inherent to us all and should not be taken away <a href="http://www.ohchr.org/en/what-are-human-rights">www.ohchr.org/en/what-are-human-rights</a>   |
| Industry Instrument                                   | A legally enforceable document that states the employment terms and conditions of workers in an industry or business.   |
| Informed 365 Platform                                 | A corporate social responsibility technology platform used by the Property Council to help the property industry and its members take a proactive approach to engage their suppliers around modern slavery risks.   |
| Just transition                                       | Just transition is a framework developed by the trade union movement to encompass a range of social interventions needed to secure workers' rights and livelihoods when economies are shifting to sustainable production, primarily combating climate change, and protecting biodiversity.  |
| Modern Award  | Legislation which sets out the minimum terms and conditions of employment.  |
| Modern slavery  | Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Coercion, threats, and deception in situations of modern slavery can sometimes involve clear physical indicators, such as physical confinement or confiscation of identity and travel documents. However, often coercion, threats and deception are more subtle and harder to identify. |
| Modern Slavery Act                                    | The <i>Modern Slavery Act 2018</i> (Cth).   |
| Property Council (PCA)                                | The Property Council of Australia is a national lobby group representing property developers and property owners <a href="http://www.propertycouncil.com.au">www.propertycouncil.com.au</a>   |
| Priority A suppliers                                  | Defined by GPT as suppliers with whom we spend \$1 million or more per year as well as all suppliers who operate in Global Slavery Index 2018 Hot Spot Industries, all international suppliers, and all cleaning services suppliers.  |
| Priority B and C suppliers                            | Priority B suppliers are those with whom GPT spends between \$150,001 and \$1,000,000. Priority C suppliers are those with whom GPT spends between \$20,001 and \$150,000.  |
| SDGs  | The Sustainable Development Goals or Global Goals are a collection of 17 interlinked global goals designed to be a "blueprint to achieve a better and more sustainable future for all" <a href="https://sdgs.un.org/">https://sdgs.un.org/</a>  |
| Shopping Centre Council of Australia, Code of Conduct | Developed by the Shopping Centre Council of Australia, which represents major owners and managers of shopping centres, and the Building Service Contractors Association of Australia.   |
| UNGC and UNGCNA                                       | The United Nations Global Compact is a call to companies to align their strategies and operations with ten universal principles related to human rights, labour, environment, and anti-corruption, and take actions that advance societal goals and the implementation of the SDGs. The UN Global Compact Network Australia (UNGCNA) is the Australian, business-led network of the UN Global Compact.                    |
| UNGPs   | United Nations Guiding Principles on Business and Human Rights are the current authoritative global standard for government and business on preventing and addressing business-related human rights harms <a href="http://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf">www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf</a>    |
| UN PRI  | Principles for Responsible Investment (UN PRI or PRI) is a United Nations-supported international network of financial institutions working together to implement its six aspirational principles.  |
| Walk Free's Global Slavery Index                      | Walk Free is an international human rights group focused on the eradication of modern slavery, in all its forms. Walk Free's flagship report, the Global Slavery Index (GSI) provides national estimates of modern slavery for 160 countries.   |
| Your Call   | The independent whistleblower hotline service provided to GPT to assist in the management of anonymous and whistleblower concerns and complaints. Your Call is available to all GPT employees, suppliers of goods and services (or any of their employees) as well as a relative, spouse or dependant of any of these persons.  |



**gpt.**

---

[gpt.com.au](https://gpt.com.au)