



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

# Human Rights Statement

At GPT we create experiences that drive positive impact for people, place and planet. As a leader in the Australian property sector, we understand and take seriously our responsibility to all stakeholders to uphold high ethical standards in our business practices and decision—making. A critical part of this is respecting the human rights of everyone we deal with, whether directly or indirectly.

#### **Our commitment**

GPT has been a participant in the <u>United Nations Global Compact</u> since February 2012, reporting on human rights, labour, environment and anti-corruption against the 10 principles of the Compact in our annual <u>Communication on Progress</u>.

In line with the United Nations Guiding Principles on Business and Human Rights:

- GPT recognises the responsibility of businesses 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 Organization's Declaration on Fundamental Principles and Rights at Work.
- Other voluntary principles, frameworks and guidelines inform and support our decisions on how we best respect the rights of vulnerable populations or other rights-holders including relating to First Nations engagement, environment and responsible investment.
- GPT recognises its responsibility to undertake human rights due diligence to identify, prevent, mitigate and account for its human rights impacts. We regularly assess our actual and potential human rights impacts, acting on and tracking responses, and communicating how these impacts are managed and



addressed. GPT is also committed to providing access to or cooperating to remedy adverse human rights impacts, wherever GPT causes, contributes to or is directly linked to those impacts.

 GPT is committed to continuous improvement in our actions to respect and uphold human rights including collaboration with our customers, supply chain and wider industry network.

GPT's commitment to human rights applies to our operations and our engagement with third parties and is embedded in our policies, systems and processes. This is relevant to all areas of our business, in particular our people, our customers, our supply chain and procurement practices, compliance and risk management, and our community engagement and philanthropic activities.

We make the following specific commitments in respect of our key stakeholders:

Our investors, customers and communities

- Transparent policies, processes and reporting practices to communicate our approach and response to human rights in our business practices
- Places and experiences that promote health, wellbeing and community
- Resilient assets that optimise environmental outcomes and contribute to a sustainable environment
- Communicating and mitigating any potential impacts on human rights
- The right to privacy
- Freedom from discrimination, including based on personal characteristics (such as culture, religion, gender identity or sexual orientation), and
- Meaningful engagement with First Nations peoples.

## Our people

- A culture that reflects our <u>company values</u>, and that fosters psychological safety and trust, including speaking up about things that matter, equal opportunity and diversity, and professional development and learning
- A safe workplace that promotes health and wellbeing, free from psychosocial hazards and risk of harm, including through harassment, bullying, victimisation or discrimination
- Fair wages and benefits including continuous advancement on achieving gender pay equity
- The right to privacy
- The right to freedom of association and collective bargaining, and



 A workplace free from slavery as defined by the Australian Modern Slavery Act 2018 (Cth), including forced, bonded, involuntary or child labour.

## Our supply chain

- Clear expectations in our <u>Supplier Code of Conduct</u> and related procurement and supplier management processes that encourage and enable suppliers to identify, assess and manage potential human rights issues in their business practices, including in their supply chains.
- Proactive engagement and fostering of long-term collaborative relationships, including to support innovation to achieve the United Nations' 17 Sustainable Development Goals, and
- Access to GPT grievance mechanisms for workers in our supply chains, and GPT's cooperation to remedy adverse human rights impacts, wherever GPT causes, contributes to or is directly linked to those impacts.

# **Policies and procedures**

GPT has various mechanisms in place, including policies, procedures, frameworks and strategies, which underpin our approach to human rights, addressing how we work and how we engage with our stakeholders. As GPT's operations are Australian based, these mechanisms reflect Australian legislation with regard to human rights (for example, privacy, anti-discrimination, modern slavery and labour laws).

GPT's commitment to human rights is evidenced by:

- Our <u>values</u> and our <u>Code of Conduct</u>: These create a common framework around the standard of behaviour expected of all GPT directors and employees, and form part of our induction as well as ongoing training and engagement activities. Our values and our Code of Conduct are supported by policies such as GPT's <u>Equal Employment Opportunity and Workplace Behaviour Policy</u> and robust channels and processes for lodging and investigating grievances. We make public commitments and participate in external benchmarks such as our Reconciliation Action Plan and Workplace Gender Equality Agency reporting. We also publicly disclose our priorities and approach to <u>Diversity and Inclusion</u>, which includes our work to address gender equality, and First Nations and LGBTQIA+ inclusion.
- Our <u>Supplier Code of Conduct</u>: This sets out the behavior and conduct expected
  of organisations that we engage to provide us with goods and services. All
  suppliers participate in a comprehensive Supplier Pre-qualification Survey and

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ongoing compliance monitoring and improvement, and supplier performance is regularly monitored. 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.

- Our <u>Privacy Policy</u>: This sets out our practices relating to privacy to ensure all
  personal information collected by GPT is handled in line with legal and regulatory
  requirements, and in accordance with the Privacy Act. Individuals have a right to
  understand these practices, and a right to have access to the personal
  information we hold about them, with their consent.
- Our compliance and risk management frameworks: The GPT Board is responsible for overseeing these frameworks for identifying, assessing, managing, mitigating and reporting on all material risks, including risks related to human rights.
- Our <u>Modern Slavery Statement</u>: The Modern Slavery Statement outlines our actions taken during the year and those proposed to be taken in the future, to assess and address modern slavery risks in our business. The Statement is focused on enhancing human rights transparency in our operations and supply chain, in line with the Australian Modern Slavery Act 2018 (Cth). GPT's Modern Slavery Committee is responsible for oversight and management of GPT's modern slavery obligations and is comprised of senior executives across a number of functions, including GPT's Chief Risk Officer and the Group General Counsel.
- Our <u>Grievance</u> and <u>Whistleblower</u> mechanisms: These procedures provide a clear and transparent framework for our stakeholders to safely, confidently and anonymously raise concerns about potential human rights impacts in our operations and supply chain. GPT employees, suppliers, volunteers and related external parties can confidentially report concerns about improper conduct by GPT or its suppliers, which enables us to swiftly and appropriately address any concerns that are identified.
- Our First Nations engagement and <u>Reconciliation Action Plan</u> (RAP): The RAP embodies GPT's commitments and actions to embed reconciliation and the rights of First Nations Peoples in our business practices, in accordance with the United Nations Declaration on the Rights of Indigenous Peoples. Our RAP and our community engagement strategies guide our contributions to building stronger,



more resilient communities in Australia. GPT has a RAP Working Group comprising a sub-committee of cross-functional business representatives and a First Nations External Advisory Group, which guides and provides oversight of GPT's First Nations engagement and actions.

- Our community and customer engagement, and Social Plans: GPT's works
  collaboratively with stakeholders in the communities where we operate,
  supported by our Sustainability Policy, Community Engagement Policy and
  Customer Engagement Policy. Each GPT asset under management has a tailored
  Social Plan aligned to GPT's strategy and reflecting the key priorities of that
  community. We publicly report on our activities, including in our annual
  Sustainability Report.
- Our <u>environmental sustainability</u> policies: These set out GPT's commitments and obligations relating to sustainability, biodiversity, climate change and energy, materials and waste management and water. GPT recognises everyone has the right to a clean, healthy and sustainable environment, and we are committed to ensuring our business practices and supply chain reflect this. GPT publishes targets, risks, actions and data regarding its impacts on the environment in our <u>Climate Disclosure Statement</u> and <u>Sustainability Report</u>. We are committed to contributing to a just transition by supporting our stakeholders and communities to transition to a climate-resilient economy.
- Our responsible investment commitment: In line with the UN Global Compact and the United Nations Principles of Responsible Investment, GPT considers human rights in our investment activities and reporting.

#### **Grievance mechanisms**

We encourage all stakeholders to report any concerns or feedback they may have regarding how we manage human rights in our operations and our supply chain. We recognise grievance mechanisms must be known, trusted and accessible as per the United Nations Guiding Principles on Business and Human Rights. We will act quickly to investigate and resolve any suspected human rights violations, and we are committed to providing timely and meaningful responses to our stakeholders. We review our practices and policies at least annually.

Grievances can be reported in any of the following ways:

All stakeholders: The complaints mechanism on the GPT website.

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- All stakeholders: Reporting privacy complaints as articulated in <u>GPT's Privacy</u>
   <u>Policy</u>, which includes contact details for GPT's Privacy Officer and the Office of the Australian Information Commissioner.
- GPT Investors: The complaints mechanism outlined on the GPT website which
  includes contact details for Link Market Services Limited as GPT's Registry and
  Securityholder Service Centre; and the Australian Financial Complaints Authority.
- GWOF and GWSCF Investors: The complaints mechanism outlined on the GPT
   Funds Management website, which includes contact details for the Australian
   Financial Complaints Authority.
- GPT employees, suppliers and related parties: The process outlined on the GPT website, in the GPT Whistleblower Policy, which includes contact details for GPT's independent service provider "Your Call".
- **GPT employees:** The process outlined in the <u>GPT Grievance Policy</u>.
- Customers, tenants and community stakeholders: Directly with our employees
  and our contractors operating in a role that may receive a complaint (such as
  concierge services, security), in many different ways including in person, by
  telephone, email or electronic form including via "Contact Us" details provided on
  asset websites, social media and via the GPT website.

## **Governance and oversight**

GPT is committed to upholding good governance across our business practices. All GPT employees, including the GPT Board are required to comply with our policies. Furthermore, policies and contractual obligations relevant to this Statement also extend to GPT's supply chain.

GPT's Human Rights Statement has been reviewed and approved by GPT's CEO and Managing Director. Responsibilities under this Statement cascade across the business through various policies, frameworks and working groups including relating to modern slavery, procurement, risk and audit, First Nations engagement, human resources and privacy. GPT's Chief Risk Officer is responsible for overseeing the approach and implementation of this Statement across the Group, including the continuous improvement of reporting practices, risk management, actions and effectiveness measures.

This Statement is reviewed at least every three years, or more frequently if required in order to incorporate any legislative or best practice enhancement opportunities.



# **Document Control**

Version	Document Owner	Author	Description	Document Approver	Approval / Revision Date
1.0	Chief Risk Officer	J O'Dea	Original Version	CEO and Managing Directo	r Approved June
			Version	(next review 2023)	2020
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