

17 March 2022

Scentre Group Limited ABN 66 001 671 496



# **2021 Modern Slavery Statement**

**SCENTRE GROUP**

*Creating extraordinary places,  
connecting and enriching communities*

# About this statement

Scentre Group's 2021 Modern Slavery Statement sets out the actions taken by the Group to identify, assess and address the risks of modern slavery occurring in its operations and supply chain, including for the purposes of meeting the mandatory reporting criteria set out in section 16 of the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act), for the period 1 January – 31 December 2021.

The statement is prepared by Scentre Group Limited on behalf of the entities in Scentre Group (ASX: SCG) (the Group). The Group is a stapled group comprising Scentre Group Limited, Scentre Group Trust 1 (SGT1), Scentre Group Trust 2 (SGT2) and Scentre Group Trust 3 (SGT3), and their controlled and managed entities. The Boards of Scentre Group Limited, Scentre Management Limited (as responsible entity of SGT1), RE1 Limited (as responsible entity of SGT2) and RE2 Limited (as responsible entity of SGT3) are identical. Scentre Management Limited is also the responsible entity of Carindale Property Trust, a listed managed investment scheme (ASX:CDP).

More information about the Group can be found in the Scentre Group 2021 Annual Financial Report available in the investor section on our website.

The Group has a common set of governance policies and procedures and a common risk management framework which are described in sections 5 and 6 of this statement. The entities and operational teams which comprise the Group were consulted in the preparation of this statement. As part of our consultation process, risk assessments were conducted of the modern slavery risk for each operational team, which in turn informed the Group's consideration of the modern slavery risks in its operations and supply chains.

This statement was approved by the Board of each of Scentre Group Limited, Scentre Management Limited (as responsible entity of Scentre Group Trust 1 and Carindale Property Trust), RE1 Limited (as responsible entity of Scentre Group Trust 2) and RE2 Limited (as responsible entity of Scentre Group Trust 3) on 16 March 2022.

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# Message from our Chief Executive Officer

Responsible business is core business. This includes playing our role in eradicating modern slavery, which is built into how we operate. We are committed to developing and operating our leading platform of 42 Westfield Living Centres across Australia and New Zealand in a way that respects the dignity, wellbeing and human rights of our people and the communities in which we operate.

We take these commitments very seriously.

In our second Modern Slavery Statement, we set out how we have built on our 2020 actions to identify, assess and address the risks of modern slavery occurring in our operations and supply chain.

A key part of our approach is engagement – with our people, suppliers, industry partners, investors and other stakeholders such as industry peers and advocacy groups. We believe it is important to hear their feedback and understand how we can continue to enhance and improve our disclosures and reporting as part of our commitment to operating as a responsible, sustainable business.

What we found from this engagement is that there is a desire to learn about how we address the risk of modern slavery, and how we can help others address this. This came out particularly through our engagement with our suppliers, and in 2022 we will work with them to understand how we can best partner with them. We appreciate that the COVID-19 interruptions over the past two years has led to additional burdens on our suppliers, and their people, as well as potentially increased the risk of modern slavery among vulnerable workers.

In 2021, we continued to embed our approach to managing the risk of modern slavery across our business, including in our risk, procurement and contract management processes. Some key highlights included our business-wide approach to integrating modern slavery risk on team risk registers, targeted education and engagement with our key procurement teams, and our supplier grievance management policy.

This year our focus will be on embedding our approach to supplier engagement and grievance management across our business, through targeted training with our suppliers and their team members, and engagement with our investors and industry peers to understand their approach to, and focus on, modern slavery risk.

We look forward to continuing to play our part in reducing risk in our supply chain and helping to eradicate modern slavery from global supply chains.



**Peter Allen** | Chief Executive Officer  
17 March 2022

**At Scentre Group we believe that it is important that our people, partners and our communities are treated with respect.** Our proactive approach to identifying, assessing and addressing human rights and modern slavery risks is fundamental to achieving Our Purpose, Our Plan, Our Ambition and reinforcing our DNA. These are the values and standards of behaviour we expect of ourselves and of others. Our Human Rights Policy and our Supplier Code of Conduct set out these expectations.

## Our Purpose

Creating extraordinary places, connecting and enriching communities

## Our Plan

We will create the places more people choose to come, more often, for longer

## Our Ambition

To grow the business by becoming essential to people, their communities and businesses that interact with them

We will expand and enhance our three growth pillars



Businesses



Our Platform



People & Communities

We are a responsible, sustainable business



Community



People



Environmental Impact



Economic Performance

## Our DNA

We put our customers first

We act with integrity

We strive for excellence

We succeed together

We are constantly curious

We create a positive legacy

# 1 About Scentre Group

Scentre Group owns and operates a leading platform of 42 Westfield Living Centres with 37 located in Australia and five in New Zealand.

Our Westfield Living Centres are strategically located in close proximity to 20 million Australians and New Zealanders. Our Living Centres are hubs of local economic activity which contribute to local employment and support a network of local businesses and suppliers.

Each Westfield Living Centre is different, reflecting the differing needs of its customers and community. Our teams are focused on listening to our customers and curating the optimal mix of products, services and experiences for them. We engage with our customers and communities to understand which brands, experiences and services they want and consider this as part of our long-term asset planning process.

In 2021, we had 413 million customer visits and total sales through our platform were \$22.1 billion, despite more COVID-19 restrictions than in 2020. This highlights that our Westfield Living Centres are essential social infrastructure and are destinations that deliver the products, services and experiences our customers want.

The Group invests in its assets through redevelopment opportunities, ensuring our Living Centres meet the changing needs of our customers and business partners. Many centres in the portfolio are owned jointly with leading property investment institutions. As at 31 December 2021, the Group's total assets under management are \$50.4 billion.

## 1.1. Our operations

Scentre Group is vertically integrated with the internal capability to develop, design, construct, operate and manage our Westfield Living Centre portfolio. Our direct operations are located in Australia and New Zealand.

Because of the composition of our direct workforce and the established policies, procedures and learning and development programs in place, we consider that the risk of modern slavery occurring in our direct operations is low.

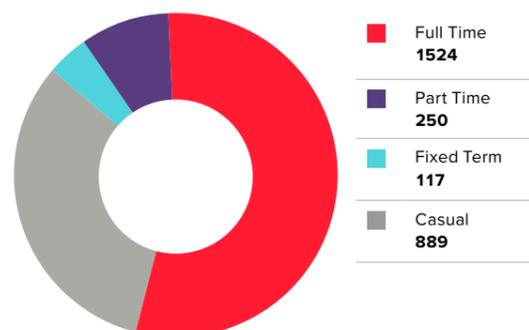
The Group is organised by teams reflecting this vertical integration, with 2,780 employees as at 31 December 2021.

Our employees are primarily in professional or managerial roles, permanently employed, either covered by an award, or award free and have their eligibility to work confirmed by us as part of our recruitment and onboarding process. Employees covered by an award are primarily covered by the General Retail Industry Award and Clerks Private Sector Award and are paid accordingly. Approximately 92% of our workforce is located in Australia.

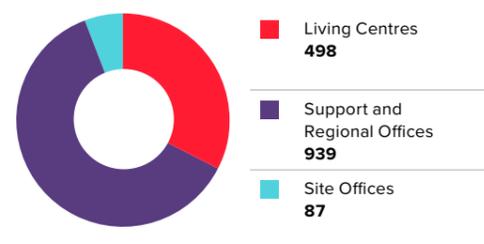
Our employment policies and processes reflect best practice. They include our Code of Conduct and our Human Rights Policy, Anti-Bullying and Anti-Sexual Harassment policies, Work Health and Safety policies, and personal, compassionate and parental leave policies, as well as our Whistleblower Protection Policy. Our learning and development programs educate our people about key workplace policies including our Code of Conduct. We regularly review our policies, practices and behaviours to confirm they continue to meet the expectations of our business partners, our communities and other stakeholders, as well as social and regulatory developments.

More information about how we engage with our people can be found in the Our People section on page 22 of our [2021 Responsible Business Report](#).

All Employees - Total 2,780



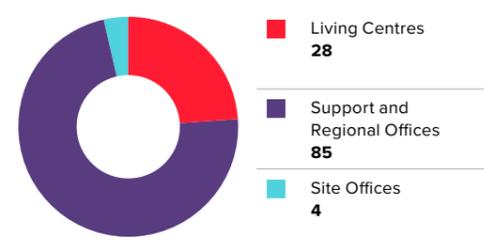
Full Time Employees - Total 1,524



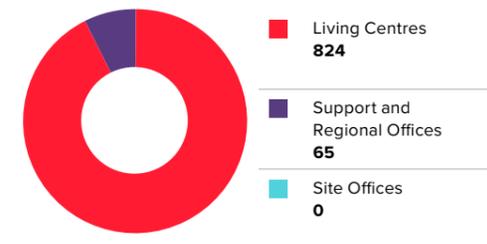
Part Time Employees - Total 250



Fixed Term Employees - Total 117



Casual Employees - Total 889



## 1.2. Our suppliers and supply chain

Our direct supply chain includes a wide range of organisations and industry sectors. These organisations are predominantly located in Australia and New Zealand, with 99% of our total supplier spend in 2021 being paid to suppliers based locally.

Most of our supplier expenditure relates to the operation of our Westfield Living Centres, particularly cleaning and security services and maintenance.

Our expenditure with suppliers in the development, design and construction categories is cyclical and depends on our development program. In 2021, our construction activities were predominantly in Australia, with the commencement of a \$355 million investment in Westfield Knox and the continuation of our \$55 million investment in Westfield Mt Druitt which opened in March 2022. Works also progressed on behalf of Cbus Property to design and construct the residential and commercial tower development at 111-121 Castlereagh Street in Sydney.

Scentre Design & Construction is the head contractor for Cbus Property's mixed-use tower development, 111 and 121 Castlereagh Street, an adaptive reuse of the former David Jones menswear store in Sydney's CBD.

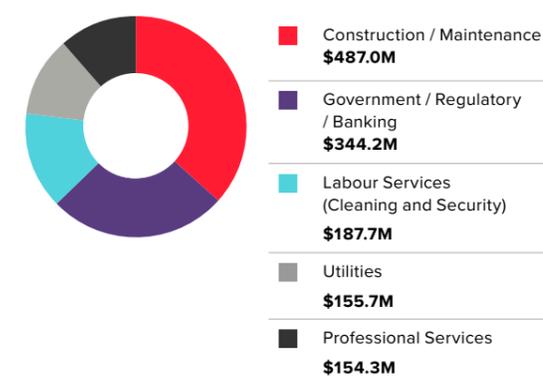
Scentre Group and Cbus Property are working together on an approach to reduce the risk of modern slavery in this development.

In recognition of the potential for construction subcontractors to be vulnerable workers and for modern slavery risks within the supply chain of building materials, Scentre Group has implemented a modern slavery due diligence program, with our subcontractors and suppliers engaged as part of the development.

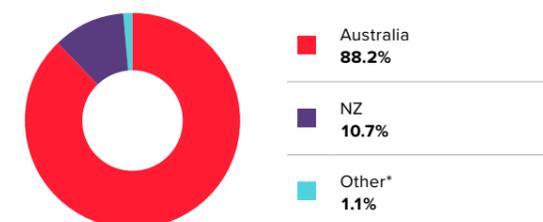
Scentre Design & Construction shares information with Cbus Property regarding its approach to mitigating modern slavery risks within its operations and supply chain via the Property Council of Australia's Informed 365 Modern Slavery platform.

All subcontractors were assessed for modern slavery risk through the completion of self-assessment questionnaires, which were reviewed by Scentre Group team members. On-site subcontractors and their employees are made aware of the Group's Whistleblower Protection Policy, as well as details of the Group's Diversity, Equity and Inclusion program, site rules and site news through digital screens located at the worksite side entry and in worksite accommodation

Top 5 Categories of Spend:



Location – Tier 1 Suppliers:



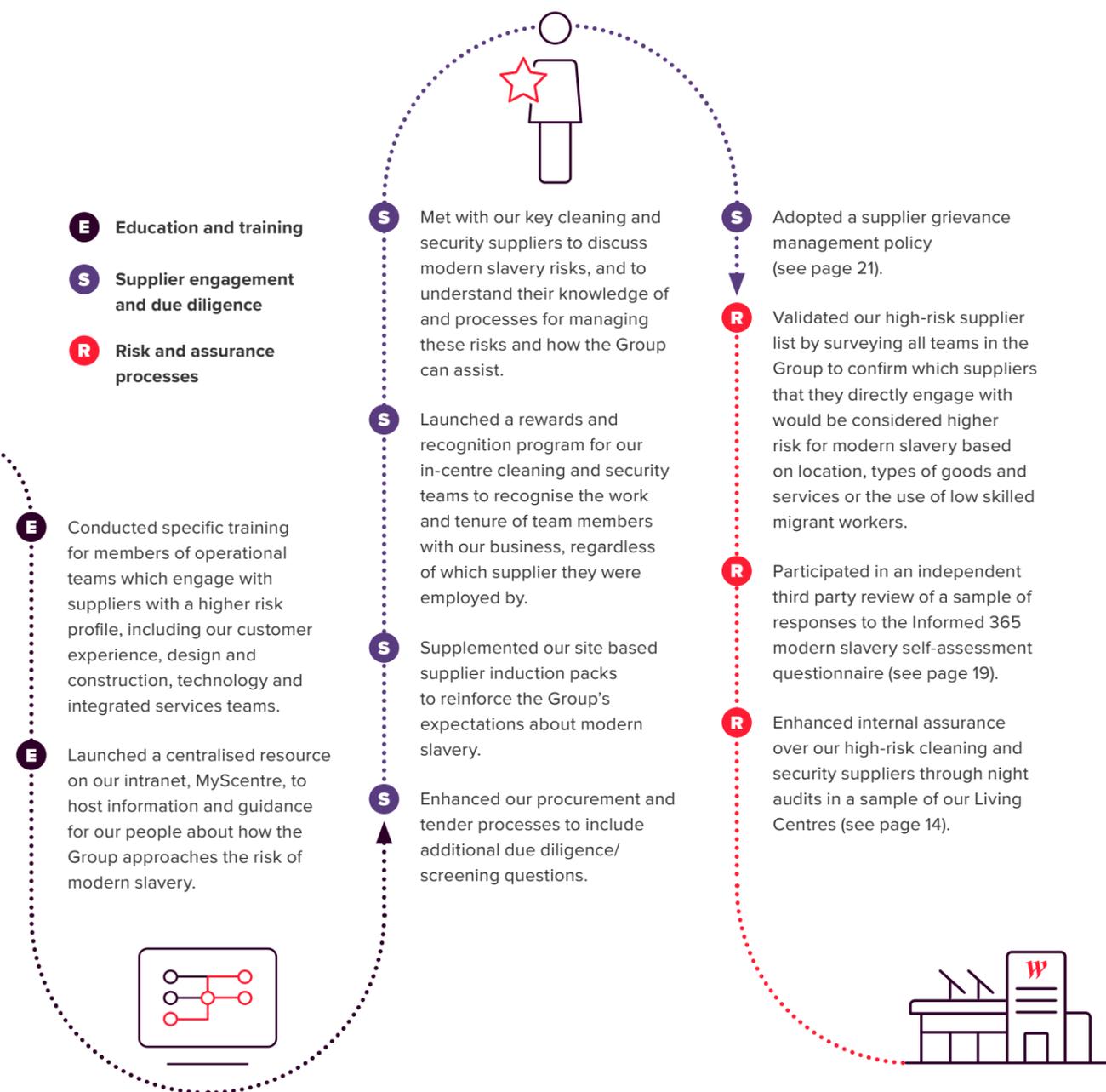
\*US, Europe, Philippines, Singapore, China, Central America, Israel, Canada

2021 Spend by Operational Area:



## 2 Our 2021 achievements

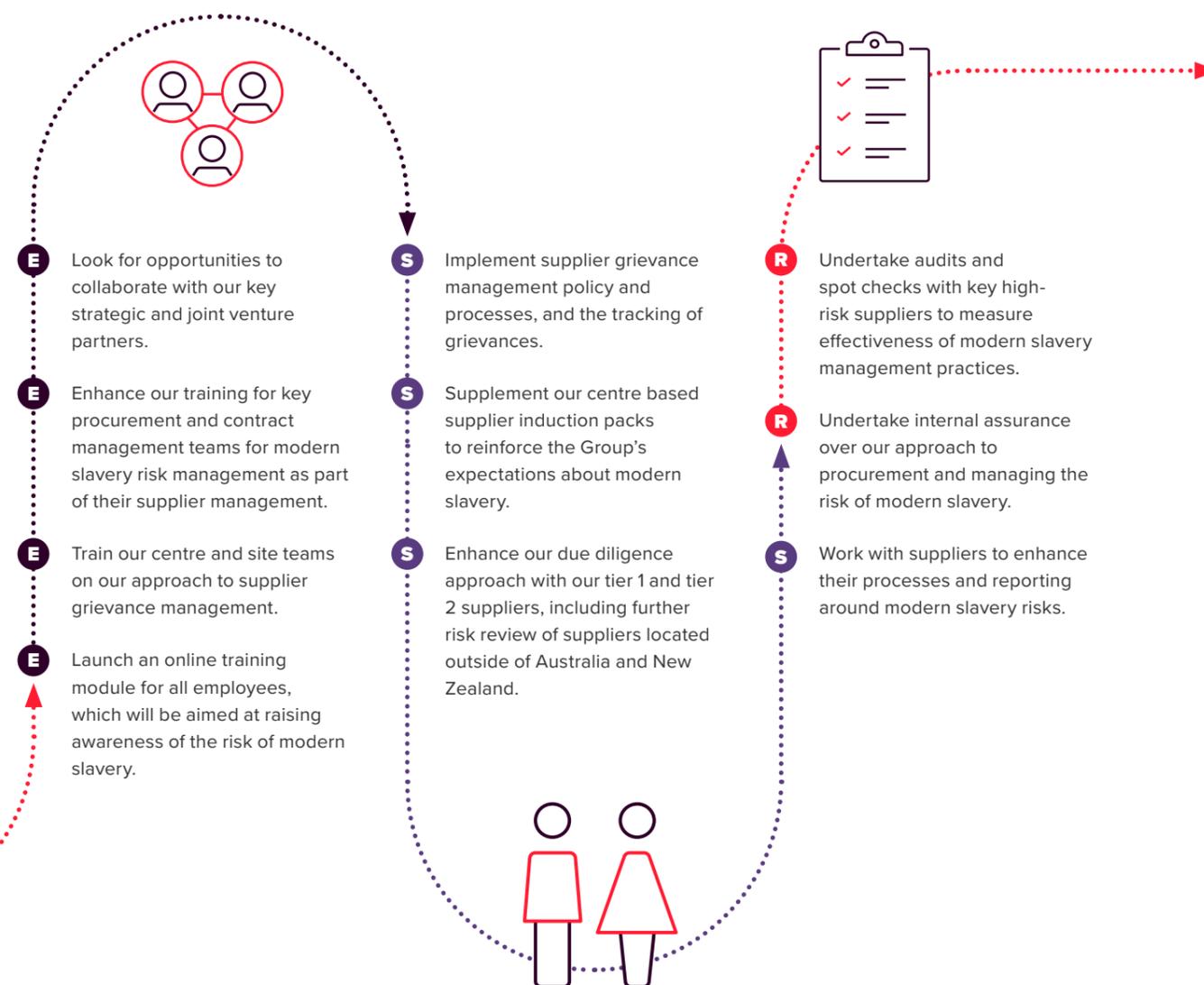
In 2021, we continued to embed our approach to managing the risk of modern slavery across our business, including in our risk, procurement and contract management processes.



## 3 Our 2022 roadmap

We recognise that how we address the risk of modern slavery in our operations and supply chain is an ongoing and evolving process. We continue to work to better understand our supply chain and business partnerships, and to work with our partners to enhance our role in eradicating modern slavery.

Building on the progress we have made to date, we have identified the following opportunities for 2022.



# 4 Our supply chain engagement

We are committed to high standards of ethical conduct and to promoting and supporting a culture of ethical behaviour and good corporate governance. This commitment extends to how we engage with our supply chain, as part of our ordinary business practices.

Our Supplier Code of Conduct sets out our expectation that our suppliers will ensure there are no instances of modern slavery in their operations and supply chains, and will comply with all applicable laws and regulations relating to modern slavery.

## 4.1 Potentially higher risk areas

As part of our approach to enterprise risk management, our risk team works with all teams to identify key risks. In 2021, our teams were asked to consider the risk of modern slavery in their supply chains directly as part of the regular review of internal risk registers, with 17 additional suppliers added to our list of high-risk suppliers.

Potentially higher risk areas were labour hire services, including cleaning and security, parts and materials sourced overseas, including design and construction materials and technology. The risk indicators identified across our high risk suppliers included:

- the use of foreign workers or temporary or unskilled labour by cleaning and security contractors, delivery partners and design and construction subcontractors
- the sourcing of construction materials, plant and equipment and parts (e.g. stone, glass, structural steel, HVAC, electrical and vertical transport) from countries outside Australia and New Zealand
- the sourcing of technology and technology components from countries outside Australia and New Zealand including connected screens, parking technology and solar panel technology
- software development, software service support and

telecommunications providers with labour located in countries outside Australia and New Zealand

- the procurement of uniforms and other goods potentially manufactured using cotton in countries outside of Australia and New Zealand.

Suppliers who are identified as having a potentially higher risk for modern slavery are surveyed using the Property Council of Australia's (PCA's) Informed 365 tool to more comprehensively risk assess their operations and supply chains and to understand what processes they have in place to address the risk of modern slavery.

To date Scentre Group has identified 82 high-risk suppliers who have been asked to complete a modern slavery risk assessment in the PCA's Informed 365 tool. Sixty (73%) of these suppliers have completed their 2021 survey and of these only 11 highlighted that they had operations outside Australia and New Zealand. This confirmed our understanding that the majority of our suppliers do not have operations outside Australia and New Zealand. In 2022, suppliers' overseas operations will be subject to further risk analysis to identify any specific modern slavery risks that need to be collaboratively addressed.

## 4.2. Tendering, procurement and contract management

The tendering and procurement processes used in our potentially higher risk areas specifically engage with the risk of modern slavery in our supply chains.

These procurement and contracting processes require our suppliers to comply with our Supplier Code of Conduct and to have a system in place to identify, assess and address the risk of modern slavery in their operations and supply chain. Potential suppliers are required to respond to screening questions about, amongst other things, the risk of modern slavery in their operations and supply chains. These responses are reviewed by team members and follow up actions are taken where the response is incomplete or indicates the supplier may be of higher risk.

As part of our tendering processes for our potentially higher risk areas of cleaning and security, we also:

- benchmark and assess pricing sustainability and validate this against applicable awards or enterprise bargaining arrangements
- confirm allowances have been made for on-boarding of new staff, leave loading, training and uniforms as well as equipment, which we review for suitability and whether they are fit for purpose for our centres
- review staffing charts to confirm resourcing is adequate, workloads are safe and can be sustainably managed, considering comparable centres and activities
- review past performance in relation to work health and safety, subcontracting arrangements and worker entitlements.

Our standard form contracts require our suppliers to have a system in place to identify, assess and address the risk of modern slavery in their operations and supply chain. We also obtain monthly confirmation from suppliers who provide these services that their workers are paid in accordance with applicable awards or enterprise bargaining arrangements. We review rostering and workplace health and safety metrics quarterly.

During 2021, we completed four facilities management tenders, which included modern slavery risk screening questions. From these four tenders, nine high-risk contracts were awarded - four cleaning contracts and five security contracts. All suppliers awarded contracts completed the PCA's Informed 365 modern slavery self-assessment.

Additionally, 10 facilities management contracts with non high-risk suppliers were awarded. All suppliers completed a modern slavery self-assessment questionnaire through the Group's external supplier prequalification supplier, Cm3, and each of these contracts include clauses requiring the supplier to identify, assess and address modern slavery risks.

## Audit spot checks

Our cleaning and security team members are an integral part of our Westfield Living Centre customer experience teams.

Our management teams engage with cleaning team members daily, we deliver our service promise for customers as one team, and our rewards and recognition program acknowledges their dedication, loyalty and tenure.

In 2021, we received an anonymous complaint that one of our cleaning suppliers was subcontracting unauthorised cleaners at three of our Westfield Living Centres. This complaint was managed under our Whistleblower Protection Policy.

We carried out simultaneous, unannounced audits to investigate the allegation at the three Westfield Living Centres. The audits were carried out during the night shift and were led by 14 Scentre Group senior managers not directly connected with the centre or management of the cleaning supplier.

No evidence was found to substantiate the original allegation of using subcontractors, with all individuals working on site during the audits confirmed to be employees of our cleaning supplier.

As part of the audits, we sought to identify who was on site from our cleaning and security teams, and confirm that the individuals on site had completed a safety induction and matched those individuals recorded on the supplier's roster.

The senior managers spoke individually with each team member on site to confirm who they worked for and whether they had any concerns about their employment conditions including pay and work entitlements, behaviours or personal protective equipment (PPE), particularly as it related to COVID-19, which had not been addressed by their employer.

In these interviews team members identified a number of matters of concern.

Total number of matters raised in 2021 centre audits	20
Work health and safety*	12
Pay conditions	5
Bullying/ sexual harassment/ discrimination	3

\* Including compliance with COVID Safe protocols (3 matters). None of the matters raised were high risk.

We engaged with the supplier to resolve the concerns.

There were 14 instances where supplier team members provided feedback to us about management of grievances by their supplier, in particular feeling comfortable that matters raised would be seriously investigated or resolved, that the process was difficult or that they had open, unresolved grievances. We asked the supplier to ensure that they reviewed their grievance process

so that it was fit for purpose and their team members could easily resolve concerns.

After the site audits, a specialist accounting firm reviewed the cleaning supplier's payroll data to verify details obtained during the audits.

There was one individual identified as both an employee of a supplier and contractor in the supplier's system, which is in contravention of our requirements that all workers be employees of the main supplier unless pre-authorised by the Group.

While the allegations that prompted the audits were not substantiated, we issued a notice of breach of contract to the supplier requiring the matters noted above to be addressed and we are working with them to do so.

The supplier confirmed they would be:

- ensuring every team member remains up to date with safety training
- providing adequate PPE
- enhancing processes in relation to working visas and correctly recording employment status.

## 4.3. Onboarding and prequalification

Suppliers who provide services in our Westfield Living Centres and are pre-qualified using Cm3 (an external supplier prequalification provider) also complete a modern slavery self-assessment questionnaire as part of our onboarding and prequalification process.

In 2022, Scentre Group will continue to review the results of these self-assessments to identify any additional areas of high risk, the level of supplier understanding and engagement about the risk of modern slavery, and use this review to inform our approach for further supplier engagement.

## 4.4. Our ongoing engagement with our suppliers and their staff

Our site and centre management teams support formal and informal engagement with our suppliers and their staff. We continue to partner and work with suppliers to continuously improve our approach to assessing and addressing modern slavery risks. How we do this depends upon the nature of the services being provided by our suppliers.

Where services are provided on our sites, such as cleaning and security:

- supplier team members complete an induction process managed by us which covers work health and safety, emergency procedures, risk and hazard identification and our behavioural expectations
- we undertake monthly work health and safety observations to confirm that work practices are carried out safely, with any non-compliance documented and tracked to resolution
- we regularly engage with team members in face-to-face meetings, including daily morning huddles, weekly team meetings, monthly safety forums and emergency response training
- we conduct team talks to focus on areas such as lost time injuries and to gain feedback to improve our management and operational processes.

We display information in centre management offices and lunch rooms letting team members know how they can raise any concerns about work practices or other grievances with Scentre Group directly.

## 4.5. Grievances

The level of resourcing required in centres was impacted by the greater number of lockdown days in 2021 than 2020, due to COVID-19 government restrictions. Four matters were raised by employees of our onsite cleaning and security suppliers with us. These matters related to pay, availability of uniform, and allegations of inappropriate behaviour, discrimination, and bullying. These matters were investigated by the Group, addressed with the relevant suppliers and resulted in two suppliers being issued with breach notices, an employee of a supplier being removed from Scentre Group sites and one Scentre Group employee issued with a formal warning.

Our expectation is that our suppliers maintain their own grievance management mechanisms and that, where appropriate, an employee of a supplier engage first with the supplier's own grievance management process before raising a grievance with us. However, we recognise that this may not always be practical or realistic.

In 2021, we formalised our approach to supplier grievance management through a supplier grievance management policy (see also page 21). This sets out the principles we apply in managing concerns, issues or incidents raised by someone who believes they are the subject of unreasonable treatment by Scentre Group, its employees, contractors or suppliers, in or in connection with a Scentre Group workplace. We recognise that the processes used to handle grievances need to be flexible in light of the circumstances in which a grievance may have arisen and at a minimum, we:

- encourage speaking up
- respect confidentiality
- aim to be impartial
- believe that timely resolution is important.

In 2022, we will engage further with our centre and site teams about our approach to grievance management and, to reinforce our policy, enhance our incident management system so that reports can be consistently managed. We will continue training of centre and site-based team members who may receive potential grievance reports from our supplier team members in how to deal with those reports.

We will also inform our suppliers and their employees who attend Scentre Group workplaces about our approach to grievance management.

2021 Grievances		How resolved
Total number of reported grievances	4	
Pay dispute	1	Breach notice issued
Bullying	1	Formal warning issued to Scentre Group employee
Work health and safety	1	Breach notice issued
General work conditions	1	Resolved in consultation with the supplier

#### 4.6. Working with our suppliers to respond to COVID-19 specific risks

Our Westfield Living Centres are essential social infrastructure for the communities in which we operate.

During the year we remained focused on COVID Safe protocols in our centres and maintaining the highest standards of cleanliness and hygiene across our centres. We leveraged our proximity to customers and communities and role as social infrastructure to support the national COVID-19 vaccine roll out. We partnered with health providers to open and support the operation of vaccination clinics in our Living Centres. These clinics targeted a broad spectrum of our communities; from aged-care and disability workers and residents to young people, as well as the broader general public.

We continued to work closely with our suppliers to understand the impact of COVID-19 on their businesses, their COVID Safe plans and to identify, assess and address any areas of concern, to maintain the health and safety of

their teams while they help to keep our Living Centres open to fulfil their essential role in the community.

Our cleaning suppliers continue to be a key part of our response to the changes in our operating environment and we have worked with them to adjust resources to suit each centre's needs as state and federal government restrictions changed. Weekly meetings to review operational requirements, which still continue, allow site managers to provide feedback and adapt our engagement with our suppliers where necessary, including staffing numbers, PPE requirements, all cleaning consumables and the wellbeing of team members. We supported cleaning and security team members who needed flexibility to help them manage the impact on their family responsibilities.

We recognise that the ongoing COVID-19 pandemic is challenging for our suppliers and their team members. We wrote to our onsite cleaning and security providers to let them know that they, their team members who support our Westfield Living Centres and their families, can access our employee assistance programs to assist with work or personal issues, on a voluntary, free of charge basis.

#### Building an inclusive culture recognising team members

Our cleaning and security team members are an integral part of our Westfield Living Centre teams. While they are employees of our suppliers, they wear the same Westfield uniforms because they are core members of our Living Centre teams. Their dedication, service and effort is important in delivering our service promise to customers.

To demonstrate our appreciation and celebrate their tenure working in our Westfield Living Centres, we introduced a Rewards and Recognition program for our cleaning and security team members.

The Rewards and Recognition program highlights their loyalty and career tenure with our business, regardless of which supplier they have been employed with over the years.

Our cleaning and security team members are presented with lapel badges and gift cards on their 10-year anniversary with Westfield, and every five years following that anniversary.

We launched our new program on 20 October 2021 - on 'Thank Your Cleaner Day'. During team morning huddles, lunches and afternoon tea events, team members who had already reached a career milestone with us were acknowledged and presented with their badges and gift cards by centre management.

At Westfield Bondi Junction we recognised over 100 years of service cumulatively by cleaning team members, and another 30 years across our security team members. The significant tenure of many of our team members across the portfolio reflects their commitment to our Westfield Living Centres and our communities.



Westfield Carindale Centre Manager, Matt Powis presents Niroshan Dedduwage with his tenure lapel pin, saying: "Niroshan has been a familiar face for customers and a highly-regarded team member for the last 23 years.

"Niroshan is an integral part of the Carindale team which can be seen in the engagement he has with the entire team and the fact that he is also often mentioned by customers when providing good feedback about experiences in our Living Centre.

"All of us at Carindale truly value his place in our team and the value he adds every day."

# 5 Our approach to risk management

## 5.1. Our risk management process

At the core of our approach to risk management is the establishment of a strong risk culture, where behavioural expectations are set by the Board and executive leadership team and actively promoted and role-modelled throughout our business. The Group's enterprise risk management policy and framework provides the business guidance as to how Scentre Group identifies, assesses, monitors and manages material business risks, including the risk of modern slavery, in our direct operations and supply chain.

Our enterprise risk management policy and framework are integrated into our day-to-day business processes. Risk management accountability is a key requirement for our business managers and leaders.

We take a risk-based approach to considering and managing the risk of modern slavery in our direct operations and supply chain, consistent with our overall approach to risk management. As part of that approach, key operational, supplier and supply chain risks are progressively captured in team risk registers where relevant, along with the causes, controls and treatment plans for those risks. The Group is continually working to enhance due diligence processes to better address such risks. Risk registers are reviewed at least annually as part of our risk management processes.

Scentre Group's direct operations take place in Australia and New Zealand

where all of our Westfield Living Centres are located, with our support offices located in Sydney, Australia and Auckland, New Zealand. We consider the risk of modern slavery occurring in our direct operations is low given the demographic and regulatory environment in which we operate, as outlined in section 1.1.

Our direct operations are supported by our supply chain, with many of our core operational activities such as cleaning and security subcontracted to third parties. Our risk reviews highlight our design and construction, facilities management and technology areas as having the potential for there to be a greater risk of modern slavery in our supply chain. How we work with our suppliers to understand this risk, and the processes we have in place for managing our relationships with our suppliers, are described in section 4.

## 5.2. Our approach to remediation

As we assess and address modern slavery risks within our direct operations and supply chain, situations that may give rise to actual or suspected instances of modern slavery may be identified. Our Modern Slavery Response Framework guides our people to respond to such incidents, or a change in circumstances which may result in a materially increased risk of modern slavery occurring.

The framework aims to protect the health and safety of workers in both our direct operations and supply chain. This

is done by educating our people and our suppliers on modern slavery risk and appropriate means to respond and remediate, if appropriate.

Our approach to achieving these objectives is guided by the principles of:

- **Safeguarding and supporting victims** - victims of modern slavery are often very vulnerable people. We recognise that our response must acknowledge that vulnerability, take appropriate steps to protect victims and not unnecessarily further disadvantage them through the remediation actions taken.
- **Respecting confidentiality** - where a potential incidence of modern slavery is identified, confidentiality should be maintained if possible, in light of the need to safeguard the victim/s and enable allegations to be properly investigated.
- **Gathering and securing information** - if there is a concern about modern slavery in our operations and supply chain, relevant information will be obtained and retained in order for the concern to be properly investigated. Consideration will be given to whether it is appropriate to use any contractual rights, including audit rights, to obtain this information.
- **Engaging with appropriate experts and authorities** - we recognise that Scentre Group may not always be best placed to directly respond to incidents of modern slavery in our operations or supply chain. Depending on the circumstances in which modern slavery occurred, it

may be appropriate to refer concerns to law enforcement or other authorities, or to work with appropriate non-governmental bodies to guide our response and, if appropriate, remediation process.

We recognise that actions taken to address modern slavery risks need to be in the best interests of the potential victim/s and our response needs to be tailored to each individual situation. We consider effective response options to include:

- developing and implementing an action plan to address risk factors or issues identified and monitoring the status of action plans to closure. This may be in consultation with our suppliers, relevant authorities or other experts and may include support or compensation for victims, enhancing supplier controls and processes as well as education and training.
- requesting suppliers obtain third-party certification or a third-party audit to understand the full extent of any issues and confirm a remediation plan is in place and tracked to completion.

## 5.3. Assessing effectiveness

We consider the effectiveness of our actions to address the risk of modern slavery as part of our overall governance and risk management framework. We assess the effectiveness of our actions around mitigating modern slavery risks by looking at:

- key deliverables being monitored and overseen through our Modern Slavery Action Group and Responsible Business Scorecard
- actual or potential incidents of modern slavery identified and addressed
- regular and active engagement with our workforce and suppliers
- the results of audits conducted (for example, wage audits or night audits)
- grievance and whistleblower complaints made and satisfactorily resolved.

The Group aims to enhance and improve the effectiveness of its actions in addressing modern slavery risks through various avenues which promote awareness, transparency and advocacy in this space.

Scentre Group also has a risk based business review and audit (internal audit) program which independently assesses the design and operating effectiveness of the Group's key controls to manage key risks. Results of any audits are reported to the Executive Risk Management Committee and the Audit and Risk Committee on a semi-annual basis. Modern slavery risks and controls are considered as part of this program.

## Bureau Veritas audit

In 2021, Bureau Veritas partnered with the PCA and Informed 365 to review and verify a sample of supplier self-assessment questionnaires completed on the PCA's Informed 365 supplier platform. The assessment asks a supplier to provide information around its awareness and assessment of modern slavery risks, and actions being taken to address such risks in their direct operations and supply chains. Twenty Scentre Group supplier assessments were reviewed with feedback provided on the quality of responses, including positive indicators as well as areas for improvement.

The review identified the key risks to our supply chain as:

- all workers being provided written and understandable information about their employment conditions prior to their entering into employment
- availability or adequacy of grievance or whistleblower mechanisms in place
- clarity/transparency over whether high risk worker types (e.g. migrant workers) present within operational supply chains
- insight or risk management controls over contractor/supplier use of sub-contractors
- adequate knowledge/understanding of the suppliers supply chain network.

Key findings from the reviews will inform our approach to supplier engagement and modern slavery risk in 2022.

# 6 Our approach to governance

Our governance practices are fundamental to the way we work as a responsible, sustainable business.

## 6.1. Our governance framework

At Scentre Group governance, ethical business practices and high standards of personal conduct are fundamental to the way we work as a responsible, sustainable business. Our governance framework supports our business in delivering Our Purpose – creating extraordinary places, connecting and enriching communities – and implements appropriate oversight and accountabilities to achieve our commitment to be a responsible, sustainable business.

Our responsible business governance framework involves an integrated, cross-functional approach. This includes leaders of relevant functions making up our key management committees, the executive leadership team and the Executive Risk Management Committee.

The Board is assisted in its oversight of risk by the Audit and Risk Committee, supported by the Executive Risk Management Committee, the executive leadership team and a dedicated risk function.

Our Modern Slavery Action Group oversees our management of the risks of modern slavery occurring in our direct operations and supply chain identified through our risk management process.

Representatives of key business areas form part of this group, which reflects our cross-functional approach, and they are consulted and informed of the Group's approach. Our Modern Slavery Action Group is guided by our responsible business strategy, overseen by our executive leadership team, and reports to the Executive Risk Management Committee.

Our Executive Risk Management Committee meets at least five times a year, and considers any material modern slavery risks identified from time to time as well as any material grievances or other incidents which may arise. These are escalated to the Board, through the Audit and Risk Committee, where appropriate.

Our Audit and Risk Committee reviews and assesses the Group's corporate risk profile, enterprise risk management policy and enterprise risk management framework at least annually, and considers reports from management on new and emerging risks, and the risk controls and mitigation measures in place to deal with those risks, which includes the risk of modern slavery. The Committee also reviews and makes recommendations to the Board in relation to the Group's modern slavery statement annually, prior to its consideration by the Board.

## 6.2. Our policies and practices

Fundamental to the way we work as a responsible, sustainable business is our commitment to ensuring our business practices reflect a high standard of corporate governance and accountability.

Our Code of Conduct sets out the standards we require of everyone who works for Scentre Group and requires our people to treat everyone they deal with fairly, courteously and with respect, and to comply with all applicable laws and regulations. Our people are required to affirm our Code of Conduct on an annual basis.

Our Human Rights Policy reflects our objective to respect the dignity, wellbeing and human rights of our people, contractors and communities in which we operate. This includes our commitment to playing our part in eradicating modern slavery.

Our Supplier Code of Conduct is the tool through which we encourage and, where appropriate, mandate requirements to help us and our suppliers to conduct business in a safe, accountable and equitable manner. Our suppliers are required to observe this code in delivering products or services to us. For example, our suppliers are expected to ensure there are no instances of modern slavery in their operations and supply chain and comply with all applicable laws and regulations relating to modern slavery as well as human rights, employment conditions, working hours, wages, benefits and entitlements. We have incorporated an obligation to comply with our Supplier Code of Conduct in our standard form contracts and key high-risk supplier agreements.

Our Anti-Fraud, Bribery and Corruption Policy sets out Scentre Group's commitment to high standards of ethical conduct and to promoting and supporting a culture of ethical behaviour and good corporate governance. It forms part of

our risk management framework and supports our Code of Conduct and our Whistleblower Protection Policy. The policy requires appropriate checks be made when selecting and engaging new business partners, and that business partners must not be engaged, or business conducted with them, if there is a material risk they will violate any of Scentre Group's codes or policies.

Our Whistleblower Protection Policy encourages reporting of instances of unethical, unlawful or improper conduct and assists in identifying behaviour which is inconsistent with our values, culture or policies. It is available for our suppliers and their employees, as well as Scentre Group directors, officers and employees. In addition to our Whistleblower Protection Officers, we have implemented Scentre Whistleblower, a secure online portal powered by Whispli (an external provider to the Group), which enables reports to be made confidentially, anonymously and at any time.

Our Whistleblower Protection Policy is publicly available and has been promoted to our people, as well as our on-site suppliers and their staff. Our Supplier Grievance Management Policy sits alongside our Whistleblower Protection Policy, to provide guidance for resolving concerns raised by our suppliers' employees which do not fall within the scope of the Whistleblower Protection Policy.

Material matters which arise under these policies are considered by the Executive Risk Management Committee and/or the executive leadership team and, where appropriate, are reported to the Board through the Audit and Risk Committee.

### 6.3. Our people

All of our people must comply with our Code of Conduct, which sets out our expectation that our people treat everyone they deal with fairly, courteously and with respect, and requires them to comply with all applicable laws and regulations. Everyone at Scentre Group is required to review and recommit to the Code each year.

Our people have also been made aware of our other policies, including our Human Rights Policy, Supplier Code of Conduct, Anti-Fraud, Bribery and Corruption Policy and Whistleblower Protection Policy.

We expect everyone at Scentre Group to play a role in creating workplaces and Living Centres that keep us all safe. We bring this to life through our culture of People Protecting People.

Our people are a key part of our approach to managing the risk of modern slavery in our supply chain. We educate them about modern slavery, Scentre Group's commitment to eradicating modern slavery and how we will manage the risk of modern slavery in our supply chain.

We achieve this through our learning and development programs, our approach to knowledge sharing and cross-functional integration for projects, and the tools we make available to our people to perform their roles.

As part of this approach, we have provided online training on the risk of modern slavery to our procurement staff, senior managers and other staff who are involved in making decisions which may be impacted by the risk of modern

slavery, or engage with suppliers who are deemed to have a high risk profile. Among other matters, the training is tailored to cover:

- how to assess and address modern slavery risks with the Group's suppliers
- the role of the Group's risk management framework and procurement processes to identify risk indicators
- identification of suppliers with a heightened risk of modern slavery and guidance on handling supplier-related modern slavery concerns
- the Group's response framework, which details our approach and possible courses if there are modern slavery instances in our supply chain.

In 2021, 95% of these targeted staff completed this training.

We have also carried out team specific workshops to help raise awareness of the risk of modern slavery. In 2022, we intend to launch an online training module for all employees, which will be aimed at raising awareness of the risk of modern slavery.

We also have a dedicated site on MyScentre, our intranet, to provide our people with further guidance and access to the tools to help them manage the risk of modern slavery as they engage with suppliers, including modern slavery risk screening questions.

### How Scentre Group addresses the mandatory reporting criteria under the *Modern Slavery Act 2018 (Cth)* is set out below

Reporting criteria:	Where we do this:	More information can be found in:
Identify the reporting entity	<a href="#">About this statement</a>	<a href="#">Scentre Group 2021 Annual Financial Report</a>
Describe the reporting entity's structure, operations and supply chains	<a href="#">Message from our Chief Executive Officer</a> <a href="#">1. About Scentre Group</a>	<a href="#">Scentre Group 2021 Annual Financial Report</a> <a href="#">Scentre Group 2021 Responsible Business Report</a>
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entity it owns or controls	<a href="#">4. Our supply chain engagement</a> <a href="#">5. Our approach to risk management</a>	
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	<a href="#">4. Our supply chain engagement</a> <a href="#">5. Our approach to risk management</a> <a href="#">6. Our approach to governance</a>	
Describe how the reporting entity assesses the effectiveness of these actions	<a href="#">5. Our approach to risk management</a> <a href="#">Audit spot checks</a> <a href="#">Bureau Veritas audit</a>	
Describe the process of consultation with any entities that the reporting entity owns or controls	<a href="#">About this statement</a> <a href="#">5. Our approach to risk management</a> <a href="#">6. Our approach to governance</a>	
Provide any other relevant information	<a href="#">Audit spot checks</a> <a href="#">Building an inclusive culture recognising team members</a> <a href="#">Bureau Veritas audit</a>	<a href="#">Scentre Group 2021 Annual Financial Report</a> <a href="#">Scentre Group 2021 Corporate Governance Statement</a> <a href="#">Scentre Group 2021 Responsible Business Report</a>

# SCENTRE GROUP

## **Scentre Group Limited**

ABN 66 001 671 496

## **Scentre Management Limited**

ABN 41 001 670 579

AFS Licence No: 230329 as responsible  
entity of Scentre Group Trust 1

ABN 55 191 750 378 ARSN 090 849 746

## **RE1 Limited**

ABN 80 145 743 862

AFS Licence No: 380202 as responsible  
entity of Scentre Group Trust 2

ABN 66 744 282 872 ARSN 146 934 536

## **RE2 Limited**

ABN 41 145 744 065

AFS Licence No: 380203 as responsible  
entity of Scentre Group Trust 3

ABN 11 517 229 138 ARSN 146 934 652