

SCENTRE GROUP

2024

Modern Slavery  
Statement

Connecting and  
enriching communities

Scentre Group owns and operates  
*42 Westfield destinations*  
in Australia and New Zealand

*Our Purpose*

Creating *extraordinary*  
places, connecting  
and enriching communities

*Our Plan*

We 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 the businesses that  
interact with them



*Eternal Sunshine by artist Mali Isabel*

*Acknowledgement of Country*

We acknowledge the Traditional Owners  
and communities of the lands on which  
our business operates.

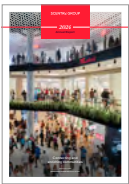
We pay our respect to Aboriginal and  
Torres Strait Islander cultures and  
to their Elders past and present.

We recognise the unique role of  
Māori as Tangata Whenua of  
Aotearoa/New Zealand.

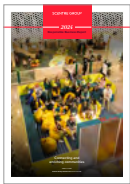
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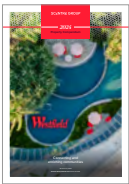
*2024 reporting suite*



*Annual  
Report*



*Responsible Business  
Report*



*Property  
Compendium*



*Corporate Governance  
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*Modern Slavery  
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# Our focus areas

*We focus on three areas to address the risk of modern slavery in our operations and supply chain: education and training, supplier engagement, and risk and assurance. How we engaged further with these focus areas in 2024 is set out below.*

<b>Education and training</b>	<ul style="list-style-type: none"><li>• We continued to participate in industry working groups and governance forums to collaborate, review and respond to regulatory and social developments in relation to modern slavery risk.</li><li>• We reviewed our approach to training to identify opportunities for improvement.</li></ul>
<b>Supplier engagement</b>	<ul style="list-style-type: none"><li>• We enhanced the supplier procurement system that supports supplier onboarding and supplier risk reviews.</li><li>• We continued our ongoing engagement with higher-risk suppliers to understand what they have learnt from their reviews of modern slavery risk and receive feedback about our approach.</li><li>• We continued our program of unscheduled checks after hours and night-shift worker engagement, supplemented with working day engagement sessions, for our higher risk cleaning and security supplies.</li><li>• We continuously reviewed our supplier observations to identify any trends that may need to be addressed.</li><li>• We reviewed how we promote the avenues for supplier team members to raise grievances and the awareness of our supplier grievance management approach.</li><li>• We reviewed design and construction pre-qualification forms, which were updated to include guidance on modern slavery risk.</li></ul>
<b>Risk and assurance</b>	<ul style="list-style-type: none"><li>• We addressed the issues identified in our 2023 internal audit of our modern slavery risk management processes.</li><li>• We enhanced our approach to supplier and counterparty due diligence and sanctions screening.</li><li>• We reviewed how we engage with modern slavery risk in our standard form contracts and assurance processes.</li></ul>

## About this statement

Scentre Group's 2024 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. Its purpose is to meet 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 2024.

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 (SGT 1), Scentre Group Trust 2 (SGT 2) and Scentre Group Trust 3 (SGT 3), and their controlled and managed entities. The Boards of Scentre Group Limited, Scentre Management Limited (as responsible entity of SGT 1), RE1 Limited (as responsible entity of SGT 2) and RE2 Limited (as responsible entity of SGT 3) 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 2024 Annual Report available in the investor section on our website.

The Group has a common risk management framework and a common set of governance policies and procedures which are described in pages 11 to 14 of this statement.

The entities and operational teams that comprise the Group were consulted in the preparation of this statement.

As part of our consultation process, operational teams risk assess their exposure to modern slavery, which informs the Group's approach to managing this risk 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 SGT 1 and Carindale Property Trust), RE1 Limited (as responsible entity of SGT 2) and RE2 Limited (as responsible entity of SGT 3) on 18 March 2025.

# Our operations

*Our Westfield destinations are part of the social fabric of the communities we serve across Australia and New Zealand. They are places people visit frequently for social connection and to access a diverse range of experiences, products and services that we curate to match their needs. Each destination is unique and caters to multiple generations of customers.*

*Our Westfield destinations are strategically located in close proximity to 20 million people and major transport hubs. They provide a platform for 3,700 businesses encompassing 12,000 outlets.*

Our strategic focus is to create more reasons for our customers to visit and spend their time in our Westfield destinations. In 2024, we hosted more than 22,000 events, of which more than 4,000 were community and cultural events. Most of these events were free for customers to enjoy and create connection through experience, contributing to people staying for longer and visiting more often. We welcomed 526 million customer visits for the year, an increase of 14 million compared to 2023.

*Our focus on attracting more customers to our Westfield destinations has driven higher occupancy and continuous sales growth for our business partners.*

Our destinations are in demand with portfolio occupancy at 99.6 per cent. In 2024, growth in customer visitation enabled our business partners to achieve total annual sales of \$29.0 billion in 2024, an increase of \$544 million compared to 2023.

*We have the largest high-quality retail portfolio in Australia and New Zealand. We continue to invest in our destinations so they reflect customer needs and capture more of their attention and time.*

The optimisation of existing space within our destinations is key to our approach to capital investment. We have successfully taken back existing department store space to introduce new and diverse uses that drive higher customer visitation and engagement. In 2024, this included a \$50 million redevelopment at Westfield Mt Gravatt in Brisbane, a \$27 million (SCG share: \$13.5 million) redevelopment at Westfield Tea Tree Plaza in Adelaide, and the introduction of three new mini majors: Rebel, JB Hi-Fi and an Aldi supermarket in space we previously took back from a department store at Westfield Burwood in Sydney. Further projects are underway at Westfield Bondi in Sydney and Westfield Southland in Melbourne.

More information on Scentre Group's operations can be found in our 2024 Annual Report and 2024 Responsible Business Report.

## Our people

**Our people are the key to our pursuit of operational excellence and achieving growth. We have team members with diverse capabilities and expertise to design, construct, operate, manage and market our platform of Westfield destinations.**

We employ 2,860 people across Australia and New Zealand, as at 31 December 2024. Approximately 93 per cent of our workforce is located in Australia and seven per cent is located in New Zealand.

The majority of our teams are made up of people in professional or managerial roles, who are permanently employed and covered by an award or are 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. Our employment policies and processes reflect industry practice.

As a result 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 slavery occurring in our direct operations is low.

## Our values

To achieve our Purpose, Plan and Ambition, we are guided by our values – our DNA – which underpin the way we build relationships with our teams, business partners, communities and other stakeholders.

Our DNA is expressed as:

- 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.

## People protecting people

The health, safety and wellbeing of our people, contractors, business partners, customers and community is our priority.

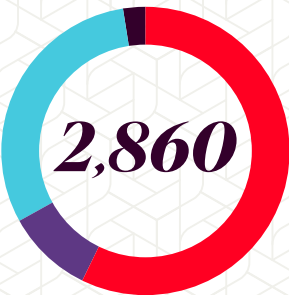
Everyone is expected to play their role in creating workplaces that keep us all safe. It is part of our culture of people protecting people.



Our operations

Our workforce includes more than 70 professions, reflecting the *diversity* of our capabilities and people.

All employees



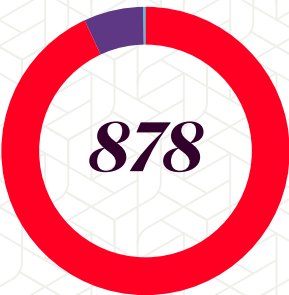
**1,644** 57.5%  
Permanent Full Time

**271** 9.5%  
Permanent Part Time

**878** 30.7%  
Casual

**67** 2.3%  
Fixed Term

Casual employees



**819** 93.3%  
Centre

**58** 6.6%  
Non-Centre

**1** 0.1%  
Site Office

Permanent full-time employees

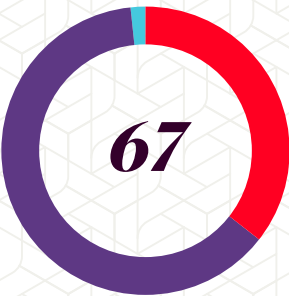


**557** 33.9%  
Centre

**1,010** 61.4%  
Non-Centre

**77** 4.7%  
Site Office

Fixed term employees

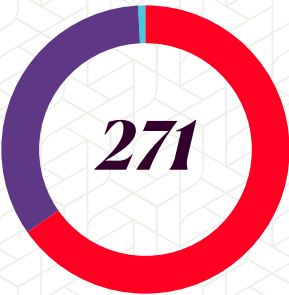


**24** 35.8%  
Centre

**42** 62.7%  
Non-Centre

**1** 1.5%  
Site Office

Permanent part-time employees



**177** 65.3%  
Centre

**92** 34.0%  
Non-Centre

**2** 0.7%  
Site Office

## Our operations

### Code of Conduct – Acting with Integrity

All our people must comply with our Code of Conduct. It sets out the expectation that they will 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, and learning and development programs educate our people about key workplace policies including our Code of Conduct. Our Code is supported by our governance policies.

We regularly review our policies, practices and behaviours to confirm they continue to meet the expectations of our business partners, communities and other stakeholders, as well as reflect social and regulatory developments. More information on our policies and practices can be found in our 2024 Corporate Governance Statement.

### Procurement risk training

Our people are a key part of our approach to managing the risk of slavery in our supply chain. We educate our teams about modern slavery, our aim to prevent it and how to manage the risks in our supply chain.

We do this through our learning and development programs, our approach to knowledge sharing and cross-functional project teams, and the tools we make available to our people to effectively perform their roles.

We share our knowledge about the risk of modern slavery with key suppliers and higher-risk supplier team members.

For our team members, we consider the nature of their roles and responsibilities to identify the best way to educate them about modern slavery risks. Education opportunities include:

#### 1. Modern slavery awareness training

We have an online training module available to all team members to raise general awareness of modern slavery and our approach to this risk.

#### 2. Guidance material

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

#### 3. Modern slavery procurement training

Our procurement team, senior managers and other team members involved in making decisions that may be impacted by the risk of slavery, or who engage with suppliers who have a high-risk profile. The module covers:

- how to assess and address modern slavery risks with suppliers
- the role of our risk management framework and procurement processes to identify risk indicators
- identification of suppliers with a heightened risk of slavery and guidance on handling supplier-related slavery concerns
- our modern slavery response framework, which details our approach and possible courses of action if modern slavery is identified in our supply chains.

In 2024, 92 per cent of these team members completed this training on schedule. Completion of mandatory training is overseen by line managers and forms part of our approach to performance assessment.

#### 4. Team-specific training

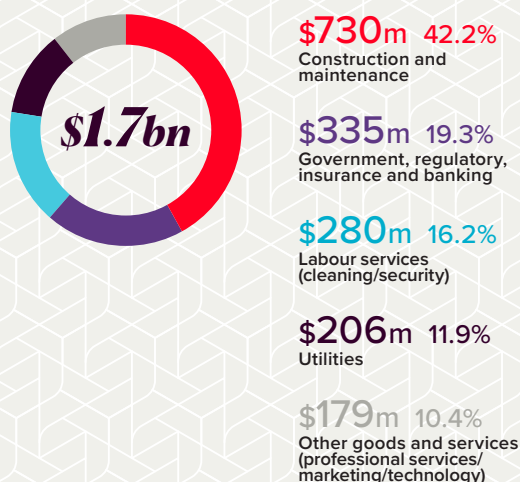
Team risk workshops are facilitated by the enterprise risk management team annually to review and discuss key risks impacting teams. Slavery risks are discussed where relevant.

We also train the team members who interact most regularly with our higher-risk cleaning and security suppliers about our supplier grievance management policy and processes. This training includes:

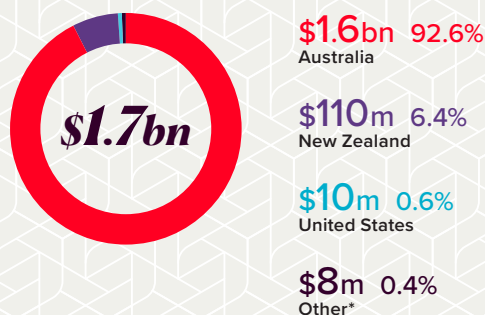
- the definition of a grievance and how to report incidents
- how team members should manage incidents
- the Group's role in supporting our contract partners.

# Our suppliers and supply chain

## Top 5 categories of spend



## Location – Tier 1 suppliers



\* Includes suppliers from Belgium, Canada, China, Finland, Germany, Ireland, Israel, Netherlands, Philippines, Singapore, Slovenia, Switzerland and UK in 2024.

## 2024 spend by operational area



The total spend includes Scentre Group's proportionate ownership and our joint venture partners' proportionate ownership. The spend reflects 100% of the outflows in relation to the entire property portfolio of Westfield destinations.

**Our direct supply chain includes a wide range of organisations and industry sectors. In 2024, 93 per cent of our total supplier spend in 2024 was paid to suppliers based in Australia.**

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

Our expenditure with suppliers in the design and construction categories is cyclical and depends on our development program and pipeline.

## 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.

We require our suppliers to abide by our Supplier Code of Conduct, Human Rights Policy and Supplier Grievance Management Policy. We operate under the Shopping Centre Council of Australia Code of Conduct for Fair Service Provisions and are a signatory to the Australian Supplier Payment Code.

Our Supplier Code of Conduct details our expectations of suppliers, including that they have safeguards to prevent instances of modern slavery occurring in their operations and supply chains, and that they comply with all applicable laws and regulations relating to human rights.

## *Our suppliers and supply chain*

### **Higher-risk areas**

Modern slavery risk assessments are embedded into our procurement processes. Our teams are asked to directly consider the risk of slavery in their supply chains as part of the annual review of team risk registers.

In 2024, our higher-risk areas remained labour hire services, including cleaning and security, and parts and materials sourced overseas (such as design and construction materials and technology).

The Group assesses its practices to address modern slavery risk, including for our higher risk labour hire services, in light of industry practice and other relevant external frameworks.

Risk indicators identified across our suppliers included:

- the use of foreign workers or temporary or unskilled labour by cleaning and security suppliers, delivery partners, and design and construction subcontractors
- the sourcing of construction materials, plant and equipment, and parts (which may include 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 digital 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 garments which may have been manufactured using cotton grown in countries outside Australia and New Zealand.

### **Further understanding our higher-risk areas**

In addition to the steps the Group takes as part of its tendering, procurement, contract management and onboarding processes outlined below, suppliers who are identified as having a potentially higher risk for modern slavery and do not report under the Modern Slavery Act are surveyed using the Property Council of Australia's (PCA's) Informed 365 platform. This assesses risks present in supplier operations and supply chains, and identifies processes suppliers have in place to address their risk of modern slavery.

In 2024, 52 higher-risk suppliers were asked to complete a modern slavery risk assessment in the PCA's Informed 365 tool.

Of these suppliers, 81 per cent completed their 2024 survey and 22 suppliers had operations or direct manufacturing outside Australia and New Zealand. We continued to follow up suppliers who had incomplete 2024 survey responses, seeking to understand why responses were not provided in full, to assess potential risks and agree on follow-up actions. Opportunities for improvement identified through the survey

process include emphasising to suppliers how important completion of the survey is to Scentre Group, and improving our understanding of why suppliers are not completing the survey.

### **Tendering, procurement and contract management**

Our contracting approach reflects how we operate as a responsible and sustainable business. Our tendering and procurement processes used in our higher-risk areas specifically address the risk of modern slavery in our supply chains.

Key aspects of our processes are set out below.

#### **1. A pre-qualification form is completed**

New suppliers complete this form prior to issue of tender. This includes modern slavery screening questions.

#### **2. A tender is issued**

A tender includes a requirement for suppliers to:

- comply with our Supplier Code of Conduct
- have a system in place to identify, assess and address the risk of modern slavery in their operations and supply chain.

#### **3. Tender responses are received**

Suppliers respond to screening questions about the risk of modern slavery in their operations and supply chains.

#### **4. Responses are reviewed**

Follow up actions are taken where the response is incomplete or indicates the supplier may be high-risk.

#### **5. Contracts are entered into**

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. Monthly confirmations that workers are paid in accordance with applicable awards or enterprise bargaining arrangements are obtained from suppliers who provide these higher-risk services.

During 2024, we awarded 22 facilities management contracts across Australia and New Zealand. Of these, 11 were awarded to high-risk suppliers (cleaning and security services). 11 were awarded to lower-risk suppliers.



## *Our suppliers and supply chain*

### **Onboarding and prequalification**

All suppliers who provide services in our Westfield destinations are prequalified using Cm3 (an external supplier prequalification provider) and complete a modern slavery self-assessment questionnaire as part of our onboarding and prequalification process.

Supplier team members complete our induction process that covers work health and safety, emergency procedures, risk and hazard identification and our behavioural expectations.

For our higher-risk cleaning and security suppliers:

- We benchmark and assess pricing sustainability, and validate this against applicable awards or enterprise bargaining arrangements.
- Allowances are reviewed for suitability and whether they are fit for purpose, including to confirm provision for onboarding of new staff, leave loading, training, uniforms and equipment.
- Staffing charts are reviewed to confirm resourcing is adequate and workloads are safe and can be sustainably managed considering comparable centres and activities.
- Past performance is considered in relation to work health and safety, subcontracting arrangements and worker entitlements.

### ***Ongoing engagement with our suppliers and their staff***

Our site and centre management teams engage formally and informally with our suppliers and their team members. This engagement allows issues to be raised early and directly with us by workers.

Our people know and regularly engage with our suppliers and their team members, including through:

- face-to-face meetings, including daily huddles, weekly team meetings, monthly contractor meetings, safety forums and emergency response training
- weekly safety walks and regular contractor audits on our construction sites
- weekly KPI inspections and quarterly supplier performance and KPI delivery meetings
- monthly work health and safety observations to confirm that work practices are carried out safely, with any non-compliance documented and tracked to resolution
- regular team talks that focus on areas such as lost time injuries and near-misses to gain feedback to improve our management and operational processes
- a dedicated contractor engagement program, where our team members meet directly with supplier team members on-site to discuss any concerns supplier team members may want to raise about their work conditions
- an annual review meeting where senior leaders from our cleaning and security providers outline their approach to modern slavery risk management including any issues or enhancements identified during the year.

We promote the avenues for supplier team members to raise grievances and the awareness of our supplier grievance management approach, through the information displayed in centre management offices and lunch rooms letting supplier team members know how they can raise any concerns about work practices or other grievances with Scentre Group directly.

# Our suppliers and supply chain

## Assessing risk

We 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.

All centre suppliers completed a modern slavery self-assessment questionnaire through the supplier prequalification provider, Cm3. All contracts included clauses requiring suppliers to identify, assess and address modern slavery risks in their operation and supply chains.

## Spot checks and audits

We conduct spot checks on matters relating to wages, employment and working conditions. This includes unscheduled checks after hours when we focus on cleaning and security supplier team members who work at times when our centres are closed and have less direct contact with our team members. On these occasions, we talk directly with supplier cleaning and security team members to discuss their feedback on a range of matters including pay, safety, training, workloads, equipment and personal protective equipment.

During 2024, we conducted 16 spot checks, including 12 which were unscheduled and conducted after hours. These checks identified the following opportunities for improvement:

- reviewing rostering to target operational requirements
- ensuring contractors had sufficient supply of uniforms, cleaning equipment and materials
- payment of award allowances including overtime.

## Grievances

Our expectation is that our suppliers maintain their own grievance management mechanisms and that, where appropriate, an employee of a supplier engages 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.

Our Supplier Grievance Management Policy sets out the principles we apply in managing concerns, issues or incidents raised by an employee of a supplier, or a supplier to a supplier, who believes they are the subject of unreasonable treatment by Scentre Group, its team members, 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 we will continue to refine our approach. At a minimum we:

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

All grievances raised with us in 2024 were investigated (with Scentre Group oversight where the investigation was undertaken by the employer). Recommendations were implemented depending on the outcome of the investigation and were tracked to resolution.

2024 Grievances	Number	How resolved
Bullying/Harassment*	1	The supplier team member the subject of the complaint was removed from Westfield sites post contractor’s investigations. Impacted teams were provided with additional support and training.
Sexual Harassment*	2	Both supplier team members the subject of the respective complaints were removed from Westfield sites post contractors’ investigations. Impacted teams were provided with additional support and training.
Pay/workplace entitlements	0	Wage audits and night audits were completed even though no grievances were raised, to proactively identify and manage any concerns.
Total number of reported grievances	3	

\* Grievances related to behaviour towards cleaning and security supplier team members, by other cleaning and security supplier team members.

# Risk management

## Our risk management process

At the core of our approach to risk management is 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. Our 42 Westfield destinations across Australia and New Zealand are operated in a way that respects the dignity, wellbeing and human rights of our team members, contractors and the communities in which we operate.

Our Enterprise Risk Management Policy and Framework provide the business with guidance as to how we identify, assess, monitor and manage material business risks, including the risk of modern slavery in our direct operations and supply chain. They are integrated into our day-to-day business processes and risk management accountability is a key requirement for our leaders.

We take a risk-based approach to considering and managing the risk of modern slavery in our direct operations and supply chain. Modern slavery risk assessments are embedded within our procurement practices with greater focus on higher-risk areas such as cleaning, security, design, construction (including solar) and technology.

*When the Group procures in higher-risk areas, we also meet with relevant suppliers as part of the tender approach. Who these suppliers are depends on the Group's procurement needs. In 2024, aligned to the Group's focus on environmental enhancements, we met with our suppliers of solar panels to better understand the processes they have in place to deal with modern slavery risks specific to their supply chain.*

Key operational, supplier and supply chain risks are also progressively captured in team risk registers where relevant, along with the causes, controls and treatment plans for those risks. Risk registers are reviewed at least annually as part of our risk management processes.

Our direct operations are in Australia and New Zealand where all our Westfield destinations are located, with our support offices located in Sydney, Australia and Auckland, New Zealand. We consider there to be a low risk of modern slavery occurring in our direct operations given the geographic and regulatory environments in which we operate.

Our direct operations are supported by our supply chain, with many of our core operational activities subcontracted to third parties. Our risk reviews highlight our cleaning, security, design, construction and technology areas as having the potential for 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 on pages 7-10.

## Our approach to remediation

In assessing and addressing 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 in responding 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 our direct operations and supply chain. Our people and our suppliers are educated on modern slavery risks, and appropriate means to respond and remediate.

## Risk management

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

- Safeguarding and supporting victims – victims of slavery are often very vulnerable people. We recognise that our response must protect victims and not unnecessarily further disadvantage them through the remediation actions taken.
- Respecting confidentiality – where a potential incidence of slavery is identified, confidentiality should be maintained if possible, to safeguard the victim/s and enable allegations to be properly investigated.
- Gathering and securing information – if concerns about slavery in our operations and supply chain are raised, 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 slavery in our operations or supply chain. Depending on the circumstances in which 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 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 these to be effective response options:

- 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 victim/s, 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 modern slavery risks, and confirm a remediation plan is in place and tracked to completion.

### 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:

- monitoring key deliverables through our Procurement Working Group, responsible business scorecard and team scorecards
- viewing and addressing actual or potential incidents of modern slavery
- regular and active engagement with our workforce and suppliers
- assessing and remediating the findings of audits conducted (for example, wage audits or unscheduled checks after hours)
- effectively resolving grievance and whistleblower complaints.

We have a risk-based business review and audit (internal audit) program that independently assesses the design and operating effectiveness of key controls to manage key risks. Results of any audits are reported to the Executive Risk Management Committee and the Audit and Finance Committee on a twice-yearly basis. Any relevant matters identified in these audits are also reported to the Risk and Sustainability Committee. Modern slavery risks and controls are considered to be part of this program.

We aim to enhance and improve the effectiveness of our actions in addressing modern slavery risks through various avenues that promote awareness, transparency and advocacy in this space.

# Governance

Our modern slavery governance framework<sup>1</sup>

**Chief Executive Officer**

Responsible for day-to-day management of Scentre Group and implementation of strategic objectives.

**Board of Directors**

Oversees the management of the Group for securityholders.

**Audit and Finance Committee**

Oversees financial reporting and the audit process.

**Risk and Sustainability Committee**

Oversees the identification and management of material business risks, and the Group’s sustainability strategy and objectives, including human rights and modern slavery.

Reviews and makes recommendations to the Board in relation to the Group’s modern slavery statement.

**Human Resources Committee**

Oversees human resources strategies and policies.

**Nomination and Governance Committee**

Oversees Board composition and succession planning, and corporate governance.

**Key management committees**

**Executive Leadership Team**

Accountable for overall implementation of strategy, including responsible and sustainable business strategy.

**Executive Risk Management Committee**

Supports the Board and Risk and Sustainability Committee in oversight of systems of risk management and internal controls, including supply chain and human rights risks.

**Procurement Working Group**

Assists the executive leadership team in its oversight of the Group’s procurement practices. Key functions of the working group include:

- establishing and monitoring procurement and supply chain management, tendering and procurement processes
- establishing and monitoring due diligence and counterparty risk assessments
- overseeing the approach to supplier engagement and oversight, including oversight of appropriate labour and employment practices of suppliers.

Any key risks, material opportunities for improvement or issues raised are escalated to the Executive Risk Management Committee.

<sup>1</sup> This framework was in place during 2024 and as at the date of this report. During the year, the prior Audit and Risk Committee was restructured to establish a new Board Audit and Finance Committee and a new Board Risk and Sustainability Committee.



## Governance

### *Our policies and practices*

Governance, ethical business practices and high standards of behaviour are fundamental to our culture and the way we operate as a responsible and 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 and sustainable business.

Our governance framework is outlined on the previous page.

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.

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 recommit to our Code of Conduct annually.

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 preventing 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 to 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. We require our suppliers to abide by our Supplier Code of Conduct, Human Rights Policy and Supplier Grievance Management Policy. We operate under the Shopping Centre Council of Australia Code of Conduct for Fair Service Provisions and are a signatory to the Australian Supplier Payment Code.

Our Anti-Fraud, Bribery and Corruption Policy is 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 our 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 people, as well as Scentre Group directors, officers and people. In addition to our Whistleblower Protection Officers, we have Scentre Whistleblower, a secure online portal powered by Whispli (an external provider), 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 team members. 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 that 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 Finance Committee, Human Resources Committee or Risk and Sustainability Committee (as appropriate).

### *Collaboration*

We collaborate with our peers, partners and members of our supply chain to learn more about our operating environment, including the risk of modern slavery, and how we can impact and influence change. Scentre Group is a member of the Property Council of Australia's Human Rights and Modern Slavery Working Group, working with our peers on initiatives to enhance the property industry's approach to human rights and modern slavery matters.

## 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	About this statement, <a href="#">page 3</a>	<a href="#">Scentre Group 2024 Annual Report</a>
Describe the reporting entity's structure, operations and supply chains	Our operations, <a href="#">pages 4–6</a> Our suppliers and supply chain, <a href="#">pages 7–10</a>	<a href="#">Scentre Group 2024 Annual Report</a> <a href="#">Scentre Group 2024 Responsible Business Report</a> <a href="#">Scentre Group 2024 Responsible Business Data Pack</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	Our operations, <a href="#">pages 4–6</a> Our suppliers and supply chain, <a href="#">pages 7–10</a> Risk management, <a href="#">pages 11–12</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	Our focus areas, <a href="#">page 3</a> Our operations, <a href="#">pages 4–6</a> Our suppliers and supply chain, <a href="#">pages 7–10</a> Risk management, <a href="#">pages 11–12</a> Governance, <a href="#">page 13</a>	
Describe how the reporting entity assesses the effectiveness of these actions	Our ongoing engagement with our suppliers and their staff, <a href="#">page 9</a> Spot checks and audits, <a href="#">page 10</a> Risk management, <a href="#">pages 11–12</a>	
Describe the process of consultation with any entities that the reporting entity owns or controls	About this statement, <a href="#">page 3</a> Our approach to remediation, <a href="#">pages 11–12</a>	
Provide any other relevant information		<a href="#">Scentre Group 2024 Annual Report</a> <a href="#">Scentre Group 2024 Responsible Business Report</a> <a href="#">Scentre Group 2024 Responsible Business Data Pack</a>

### Disclaimer

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