

SCENTRE GROUP

MODERN SLAVERY STATEMENT 2022

Creating the places
more people choose
to come, more often,
for longer

20 March 2023

Scentre Group Limited
ABN 66 001 671 496

ABOUT US

Scentre Group owns and operates 42 Westfield destinations with 37 located in Australia and five in New Zealand. Our destinations are in close proximity to 20 million people. The Group's total assets under management are \$51.2 billion represented by \$35.0 billion SCG investment, and \$16.2 billion of third-party funds.

Our strategy is to create the places more people choose to come, more often, for longer.

OUR REPORTING SUITE

This document is part of a suite of Responsible Business documents, including:

 [Responsible Business Report](#)

 [Responsible Business Data Pack](#)

 [Climate Statement](#)

Also available:

 [Annual Financial Report](#)

 [Corporate Governance Statement](#)

 [Property Compendium](#)

 [Reconciliation Action Plan](#)

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.

ABOUT THIS STATEMENT

Scentre Group's 2022 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 2022.

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 2022 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 pages 19 to 22 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, operational teams risk assess their exposure to modern slavery, informing the Group's approach to 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 20 March 2023.



Contents

Our strategy	4
Message from our Chief Executive Officer	5
Our 2022 achievements	6
Our 2023 roadmap	7
Our operations	8
Our suppliers and supply chain	14
Our approach to modern slavery risk management	19
Our approach to governance	21

Our strategy

At Scentre Group, we create extraordinary places that connect and enrich communities. We are constantly evolving to meet the future needs of our customers. Our growth is driven by becoming essential to more people, their communities and the diverse businesses that interact with them. We are committed to growing in a responsible, sustainable way.

Our proactive approach to identifying, assessing and addressing human rights and modern slavery risks is aligned to achieving Our Purpose, Our Plan, Our Ambition and reinforces our DNA. Treating our people and business partners with respect is fundamental to our DNA, the values and standards of behaviour we expect of ourselves and of others.

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

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**

OUR EXPERTISE

Our people are the key to our success. Our focus on operational excellence means we have the capabilities and expertise within our team to design, construct, operate, manage and market our platform. Our workforce includes more than 70 job types reflecting the diversity of our capabilities and talent.

Message from our Chief Executive Officer

Operating as a responsible, sustainable business underpins our strategy and ambition to grow. It's an important part of how we create long-term value for our stakeholders.

At Scentre Group, we are committed to developing and operating our 42 Westfield destinations in a way that respects the dignity, wellbeing and human rights of our people and the communities in which we operate. This includes our supply chains and the people that form part of them. We take these commitments very seriously.

We consider the risk of modern slavery through the lens of our culture of 'people protecting people'. We engage with our people and our suppliers – through education, training and performance assessments as well as informal meetings and interactions – to build lasting relationships.

In this way, our approach to managing the risk of modern slavery is one based on ongoing dialogue with stakeholders where the matter can be discussed, questions or concerns can be raised, and any issues can be resolved.

During 2022, we focused on embedding our supplier grievance management policy and processes for our high risk suppliers and their team members. Those processes sit alongside the regular engagement our Scentre Group people have with those team members on a daily basis.

Our approach going forward is to continue this important dialogue to deepen our understanding of the risk of modern slavery and how we address the risk, and to raise awareness of our expectations and approach among our stakeholders.

We will continue to play our part in reducing risk in our supply chain and helping to eradicate modern slavery from global supply chains.

Elliott Rusanow
Chief Executive Officer

20 March 2023

Our 2022 achievements

In 2022, 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.



Education and training

- ✓ Implemented our supplier grievance management policy and processes, including training over 240 Centre Experience team members.
- ✓ Enhanced our centre-based supplier induction packs to reinforce our modern slavery risk management expectations.
- ✓ Reinforced our modern slavery training for key procurement and contract management teams.



Supplier engagement and due diligence

- ✓ Engaged with our high risk suppliers to report grievances as part of regular on and off-site meetings and improved visibility of these processes.
- ✓ Worked with our high-risk cleaning and security suppliers at all levels to promote their modern slavery risk management and grievance management processes.



Risk and assurance processes

- ✓ Carried out nine night audits and 18 spot checks of our high-risk suppliers who actively work across our Westfield destinations.

Our 2023 roadmap

Our approach to addressing the risk of modern slavery in our operations and supply chains is an ongoing and evolving process. We partner with our people, our suppliers and our broader stakeholders to identify enhancements. In 2023, we aim to:



Education and training

- Continue to engage with our key stakeholders on modern slavery risks as part of our responsible business engagement.
- Reinforce our people's engagement with modern slavery training.
- Review our approach to human rights engagement and explore opportunities for enhancement.



Supplier engagement and due diligence

- Continue to work with our suppliers (including site-based workers) and their teams on modern slavery risks to increase awareness and engagement.
- Review our Supplier Code of Conduct and refresh our suppliers' commitment to it.
- Enhance analysis and awareness of modern slavery risks in our design and construction supply chains.

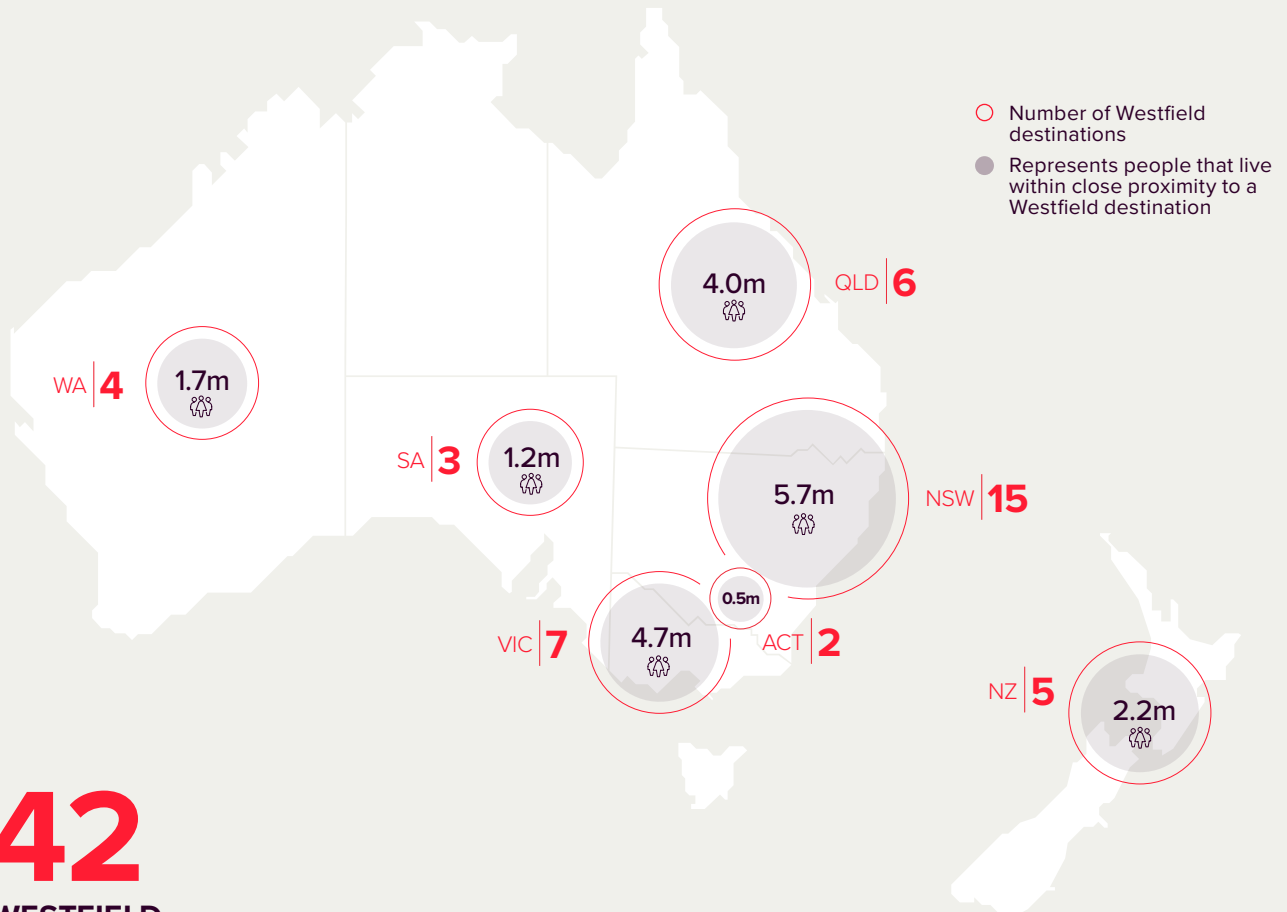


Risk and assurance processes

- Review our modern slavery risk assessments, supplier due diligence and supplier management processes to monitor effectiveness, areas for further investigation and collaboration opportunities.
- Implement learnings from our night audits (see Case Study on page 18).
- Expand our centre-based audit engagement program and approach to contractor management.

Our operations

Scentre Group owns and operates a leading platform of 42 Westfield destinations, with 37 of these centres located in Australia and five in New Zealand.



42
WESTFIELD
DESTINATIONS

20 million
People live within close proximity to a Westfield destination

480 million
Customer visits

Our Westfield destinations are in close proximity to 20 million people. Our destinations are hubs of local economic activity which contribute to local employment and support a network of local businesses and suppliers.

Our destinations are strategically located in the heart of the local communities we serve. Our centres are considered community hubs that connect people with services and experiences that enrich their daily lives. We have the opportunity to enhance the connection we have with people, so more people experience Westfield, more often and for longer.

In 2022, we welcomed 480 million customer visits to our destinations, and total business partner sales through our platform were \$26.7 billion.

Our operations

Our platform is unique. It includes our Westfield destinations, operating businesses, infrastructure, expertise and intellectual property. Evolving our platform of destinations to be reflective of the daily lives and aspirations of our local communities is a key part of our growth ambition. We continue to invest in our Westfield destinations to enhance the customer offer and experience. Many centres in the portfolio are owned jointly with leading property investment institutions.

Our people are the key to our success. Our focus on operational excellence means we have the capabilities and expertise to design, construct, operate, manage and market our platform. Our workforce includes more than 70 job types reflecting the diversity of our capabilities and talent. The Group employs 3,129 people, as at 31 December 2022. Approximately 93% of our workforce is located in Australia.



CASE STUDY

Supporting our partners to deliver their responsible business goals

Scentre Group recognises the role we can play to support our partners – in particular, our investors, co-owners and business partners – in delivering their responsible business goals.

This year the Group has been actively engaging with some of these partners to share our approach to being a responsible sustainable business.

This includes working to understand different governance and risk management frameworks, providing assurance on the Group’s approach to supply chain management, supplier social assessments and modern slavery risk management.

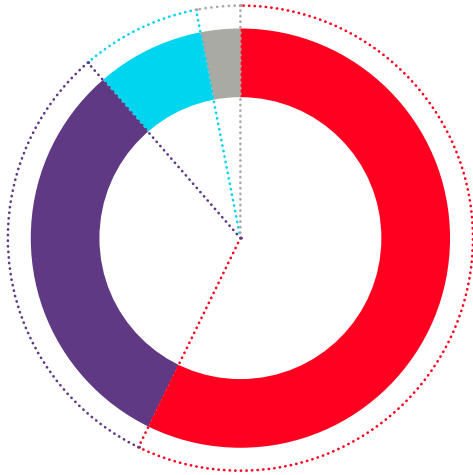
We will continue to actively engage with our co-owners at an enterprise and asset level to deliver on strategies that progress our shared goals in the area of responsible business, including modern slavery considerations.

Our operations continued

Our people

Our teams are made up of people in primarily professional or managerial roles, who are permanently employed and either 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.

All Employees 3,129



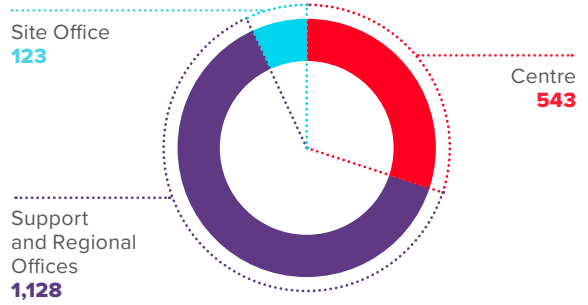
Permanent Full Time
1,794

Casual
981

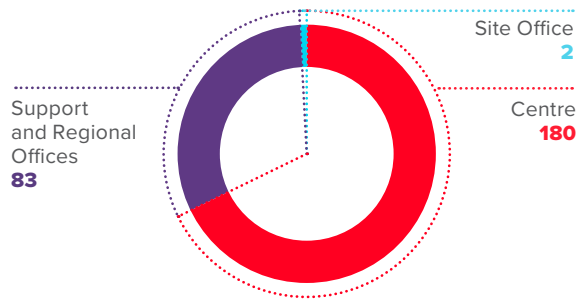
Permanent Part Time
265

Fixed Term
89

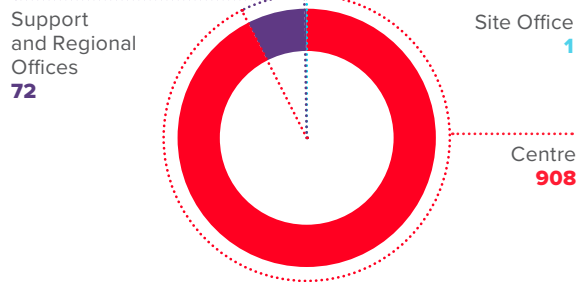
Permanent Full Time Employees – Total 1,794



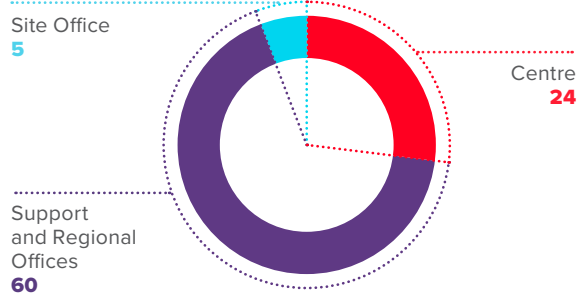
Permanent Part Time Employees – Total 265



Casual Employees – Total 981



Fixed Term Employees – Total 89





People protecting people

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

Everyone is expected to play their role in creating workplaces that keep us all safe. It's part of our culture of people protecting people and being a responsible business.

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.

CASE STUDY

Cleaning contractor safety focus

The health, safety and wellbeing of our contractors is a priority.

In 2022, in partnership with our cleaning contract providers we reinforced our focus on safety in our Westfield destinations.

We introduced monthly safety meetings to debrief the injuries that had occurred within the cleaning team, to better understand and consult on how and why they occurred.

These learnings were then shared more broadly with our risk and security, facilities and cleaning teams.

With this consistent focus on sharing and learning, we saw a reduction in injuries within the cleaning team.

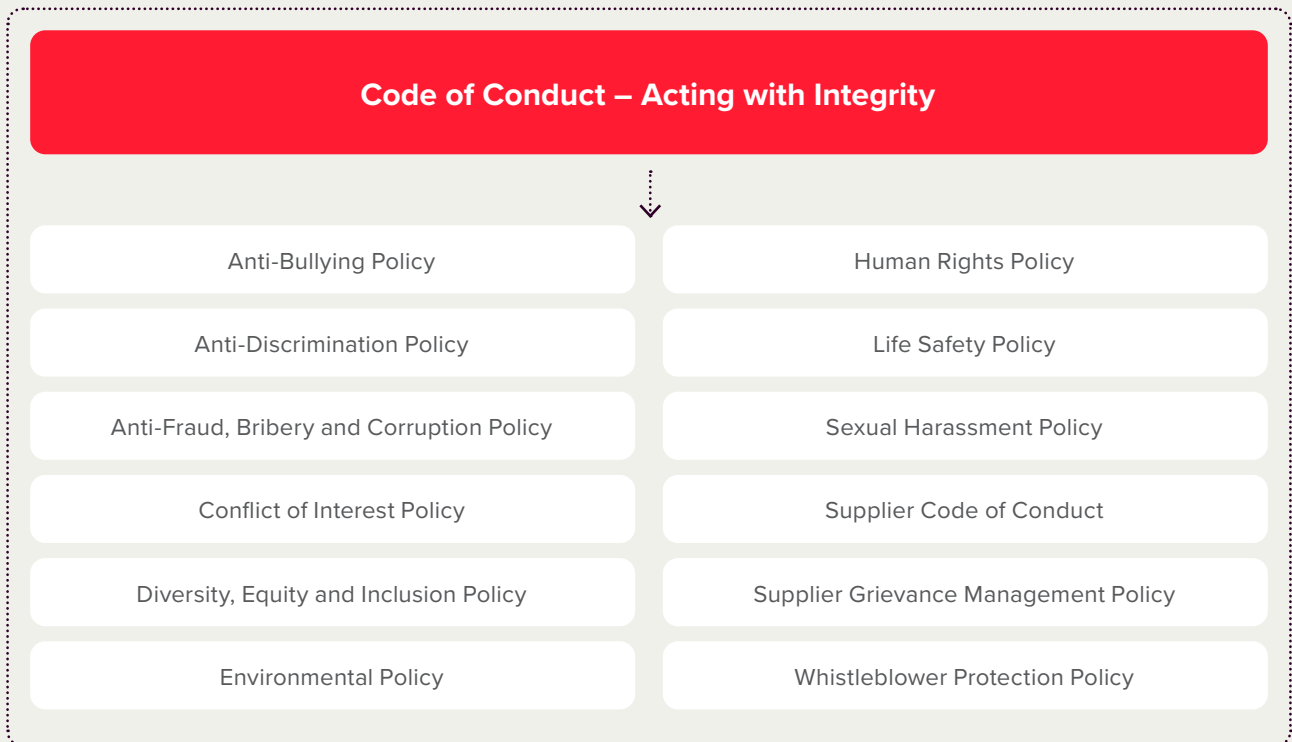
The cleaning contractor total recordable injury frequency rate fell from 13 injuries per million hours worked in 2021 to 10 injuries per million hours worked in 2022. The overall contractor average number of lost days per injury also fell from eight days in 2019 to five days in 2022.

Our operations continued

Code of Conduct – Acting with Integrity

All of our people must comply with our Code of Conduct, which sets out our expectation that our people 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. Our Code is supported by our governance policies.

Our employment policies and processes reflect industry practice. 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 reflecting social and regulatory developments.



More information about our Code of Conduct and governance policies can be found in our 2022 Corporate Governance Statement.

Our people and modern slavery risk

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 to manage the risks 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 effectively perform their roles.



More information about how we engage with our people can be found in our 2022 Responsible Business Report.

Modern slavery and procurement risk training

We have an online training module required to be completed by 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 have a high risk profile.

The module covers:

- 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 modern slavery response framework, which details our approach and possible courses of action if modern slavery is identified in our supply chains.

In 2022, 94% of these targeted staff completed this training.

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

Guidance material

Team specific workshops

Subject matter experts conduct team specific workshops to address modern slavery risks specific to impacted teams.

We also train team members who interact most regularly with our higher risk cleaning and security suppliers in our supplier grievance management policy and processes.

Modern slavery awareness training

In January 2023, we launched an online training module to all staff which is aimed at raising general awareness of modern slavery and our approach to mitigating modern slavery risks.

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 more than 98% of our total supplier spend in 2022 being paid to suppliers based in these countries.

Most of our supplier expenditure relates to the operation of our Westfield destinations, 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 and pipeline. In 2022 our construction activities continued to be primarily in Australia. We progressed our \$355 million investment at Westfield Knox (SCG share: \$178 million), in March 2022 we opened our \$55 million investment at Westfield Mt Druitt, and in November 2022 completed our \$33 million investment at Westfield Penrith and opened our \$33 million investment in Westfield Parramatta.

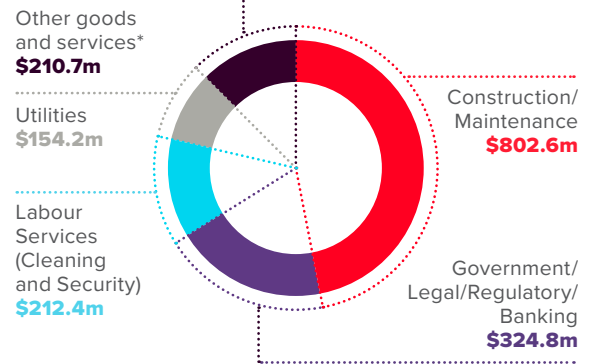
Our supply chain engagement

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 our 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.

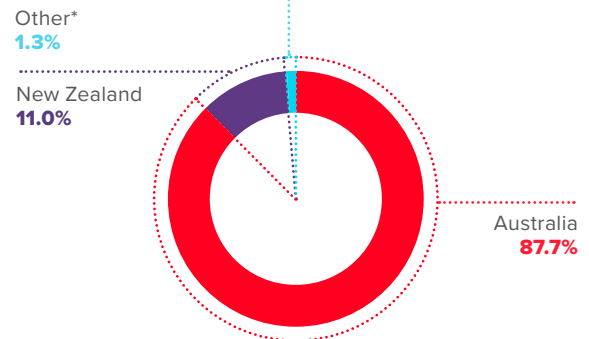
Our Supplier Code of Conduct details our expectations of suppliers, including that they ensure there are no instances of modern slavery in their operations and supply chains, and will comply with all applicable laws and regulations relating to modern slavery.

Top 5 Categories of Spend



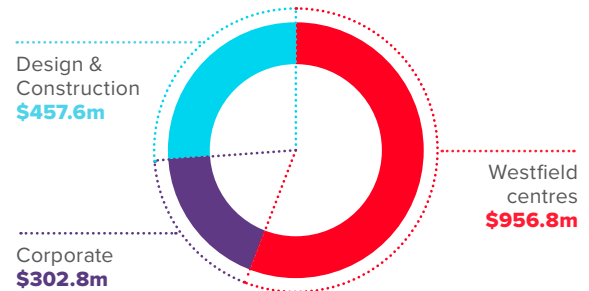
* Including professional services, marketing and technology spend.

Location – Tier 1 Suppliers



* Includes suppliers from Belgium, Canada, China, Finland, Germany, Ireland, Israel, Netherlands, Philippines, Singapore, UK and US.

2022 Spend by Operational Area



Higher risk areas

Modern slavery risk assessments are embedded into our procurement processes. To confirm we have identified all higher risk suppliers, our teams are asked to directly consider the risk of modern slavery in their supply chains as part of the annual review of team risk registers. Six additional suppliers have been added to our list of high-risk suppliers for 2023, bringing our total to 80.

In 2022, 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). 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 (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 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 assess risks present in their operations and supply chains, and to understand what processes they have in place to address the risk of modern slavery.

Scentre Group has identified 74 high-risk suppliers for 2022 who have been asked to complete a modern slavery risk assessment in the PCA's Informed 365 tool. Of these suppliers, 93% have completed their 2022 survey and only 14 suppliers highlighted that they had operations or direct manufacturing outside Australia and New Zealand. In 2023, suppliers' overseas operations will be subject to further risk analysis to identify any specific modern slavery risks that need to be collaboratively addressed.

Tendering, procurement and contract management

Our contracting approach reflects how we operate as a responsible, 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.

A tender is issued

This 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.

Tender responses are received

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

Responses are reviewed

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

For our higher risk cleaning and security suppliers:

- Scentre Group team members 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 on-boarding 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.

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.

Our suppliers and supply chain continued

Onboarding and prequalification

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

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

Our 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 on, 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 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-compliances documented and tracked to resolution
- regular team talks that focus on areas such as lost time injuries and to gain feedback to improve our management and operational processes
- a dedicated contractor engagement program, where Scentre Group staff members meet directly with supplier team members on-site so that contractual requirements are met, and to otherwise discuss any concerns supplier team members may raise around their work conditions.

We also 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.

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.

During 2022, we awarded 24 facilities management contracts across Australia and New Zealand. 11 of these contracts were for high-risk suppliers (security services).

Another 13 facilities management contracts with non high-risk suppliers were also awarded.

All Australian high-risk suppliers completed the PCA's Informed 365 modern slavery self-assessment tool. In addition, all suppliers completed a modern slavery self-assessment questionnaire through the Group's supplier prequalification provider, Cm3. All contracts included clauses requiring the suppliers to identify, assess and address modern slavery risks in its operation and supply chains.

CASE STUDY

Grievance management

In 2021, we implemented a supplier grievance management policy which details the principles we apply in managing concerns, issues or incidents raised by an employee of a supplier, including our security and cleaning supplier partners.

In 2022, we enhanced our approach to supplier grievance management by embedding our supplier grievance management policy and approach across our high risk areas, including implementing a centralised grievance register. We engaged with our centre and site teams about our approach, our supplier grievance management policy and our incident management system so that reports of concerning behaviour, which may include grievances, can be consistently identified and managed.

The grievance register generates an auto escalation process once a grievance is registered, with all actions taken recorded in the system.

We expect our team members to show the same level of diligence in resolving a grievance whether it originates from a Scentre Group team member or one of our supplier team members.

Over 240 Centre Experience team members who regularly connect with supplier team members received training about the supplier grievance management policy and the grievance register. Posters are also permanently displayed in centre offices to raise awareness amongst our supplier team members. The supplier grievance management policy was also shared with our key risk cleaning and security suppliers.

“With the policy and register in place, we wanted to raise the awareness for both our Scentre Group team members about their responsibilities should a grievance be reported, and our supplier team members about the policy and our culture of encouraging them to speak up should they feel the need to.

Communicating clearly and transparently about this important issue with our Scentre Group team members, suppliers and their team members is an important demonstration that we take their concerns seriously and are ready to respond to any concerns, issues or incidents they may have.”

Varun Nair

General Manager, Operations and Environment

Our suppliers and supply chain continued

Grievances

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.

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.

In 2022, we received 12 grievances through our grievance register from our supplier team members, which were reviewed and resolved by our team members.

2022 Grievances		How resolved
Total number of reported grievances	12	
Bullying	4	Investigation and, where appropriate, performance management
	1	Resolved in consultation with the supplier
Discrimination	1	By conciliation with the affected supplier team member
Pay dispute	6	Resolved in consultation with the supplier, with validated pay and entitlements paid to supplier team members

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 were independently investigated (with appropriate recommendations implemented depending on the outcome), and tracked to resolution.

CASE STUDY

Assessing effectiveness – night audits

Security and cleaning suppliers are integral members of our Westfield centre teams and our management teams engage with them regularly.

As part of reviewing working conditions for all our team members, we undertook nine audits to directly engage with our cleaning team members who work overnight while our centres are closed.

The audits were completed in centres across New South Wales, Queensland and Victoria by senior Scentre Group team members, with all Australian cleaning suppliers to the Group covered across the audited Westfield centres. Neither the cleaning team members nor our suppliers were told about the audits in advance.

The identities of cleaning team members onsite during the audits were confirmed and we found all the correct team members onsite. These cleaning team members were asked for their direct feedback about work conditions.

Aaron Galea, our National Operations Contracts Manager, said: “While we didn’t receive any feedback that highlighted a serious incident in terms of regulations or standards, we consider all feedback significant because it directly impacts our team members while they are working with Scentre Group.

“The most significant feedback involved a liquid dispensing unit that Scentre Group had recently invested in. Team members weren’t using it, instead they were continuing to dispense the cleaning liquids manually – which is more difficult and prone to spills.

“The team explained that having English as a second language was a barrier for them and they hadn’t understood how to use the dispensing unit when shown, so they didn’t use it.

“We asked our suppliers to provide more training so that the team understood how to use the dispenser and could begin to gain the benefit of the equipment, which makes it easier and safer for our people. It also raised our awareness of potential language barriers and we reminded our centre teams that it is important to consider this.”

Our approach to modern slavery risk management

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. We expect that 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.

The Group's enterprise risk management policy and framework provides the business 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.

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. Modern slavery risk assessments are embedded within our procurement practices with greater focus on higher risk areas such as cleaning, security, design and construction (including solar) and technology.

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.

Scentre Group's 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 the risk of modern slavery occurring in our direct operations as low given the demographic and regulatory environment 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 design and construction, facilities management 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 14–18.

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 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. Our people and our suppliers are educated on modern slavery risks, and appropriate means to respond and remediate.

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 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 victims and enable allegations to be properly investigated.
- **Gathering and securing information** – if concerns about modern 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 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 remediation process.

Our approach to modern slavery risk management continued

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 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 Modern Slavery Action Group, Responsible Business Scorecard and team scorecards
- reviewing 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 night audits)
- effectively resolving grievance and whistleblower complaints.

Scentre Group also has a risk based business review and audit (internal audit) program which 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 Risk Committee on a semi-annual basis. Modern slavery risks and controls are considered as part of this program.

.....

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.

Our approach to governance

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

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.



Our approach to governance **continued**

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 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 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.

We require our suppliers to abide by our Supplier Code of Conduct, Human Rights Policy, and our 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 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 people, as well as Scentre Group directors, officers and people. 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 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 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.



Read our Corporate Governance Statement.

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, page 2	Scentre Group 2022 Annual Financial Report
Describe the reporting entity's structure, operations and supply chains	Our strategy, page 4	Scentre Group 2022 Annual Financial Report
	Message from our Chief Executive Officer, page 5	Scentre Group 2022 Responsible Business Report
	Our operations, page 8	Scentre Group 2022 Responsible Business Data Pack
	Our suppliers and supply chain, page 14	
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, page 8	
	Our suppliers and supply chain, page 14	
	Our approach to modern slavery risk management, page 19	
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 2022 achievements, page 6	
	Our operations, page 8	
	Our suppliers and supply chain, page 14	
	Our approach to modern slavery risk management, page 19	
Describe how the reporting entity assesses the effectiveness of these actions	Our approach to governance, page 21	
	Case study, page 18	
Describe the process of consultation with any entities that the reporting entity owns or controls	Our approach to modern slavery risk management, page 19	
	About this statement, page 2	
	Our approach to governance, page 21	
Provide any other relevant information	Supporting our partners to deliver their responsible business goals, page 9	Scentre Group 2022 Annual Financial Report
	Cleaning contractor safety focus, page 11	Scentre Group 2022 Corporate Governance Statement
	Grievance management, page 17	Scentre Group 2022 Responsible Business Report
	Assessing effectiveness – night audits, page 18	Scentre Group 2022 Responsible Business Data Pack

Contact

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

Investor information

Level 30

85 Castlereagh Street
Sydney NSW 2000

GPO Box 2975
Melbourne VIC 3001

Website

www.scentregroup.com

SCENTRE GROUP

www.scentregroup.com