

Anti-Discrimination Policy

Effective Date: December 2022

Creating extraordinary places and
experiences that connect, enrich and
are essential to our communities

1 Our commitment

At Scentre Group, we are committed to promoting a physically and psychologically safe and secure working environment for our people. Our people vision is to create “a place where talent can thrive”.

To achieve this, our commitment is to create a work environment underpinned by diversity, equity and inclusion, where our people can be their whole and true selves at work and be inspired to thrive.

As part of delivering on Our Purpose – ‘creating extraordinary places, connecting and enriching communities’ – we also aim to create and support a diverse workforce reflective of the communities in which we operate.

To do this, we aim to provide a working environment free from discrimination. Scentre Group does not tolerate any form of discrimination in the workplace, including in relation to employment or in our dealings with third parties. This means that we take appropriate and proportionate action to stop discrimination in our workplace.

We are also committed to creating a place where our people feel safe to speak up about behaviours and conduct that negatively impacts them or that they have observed. This safe environment encourages people to speak up early when the discrimination first occurs.

Our open culture and leadership create an environment which aligns with being the place for talent to thrive.

2 Purpose

This policy and associated Anti-Discrimination Support Guidelines and Manager’s Guide applies to any person who carries out work in any capacity for Scentre Group, and includes employees, consultants, labour hire staff, volunteers, apprentices and contractors.

The policy provides guidance on:

- recognising discrimination and understanding what constitutes discrimination in the workplace
- the roles and obligations of all team members
- what constitutes the workplace
- our obligations to the people we interact with including our contractors and consultants
- clarity to complainants and witnesses of discrimination
- how to report discrimination
- ways we can help
- how Scentre Group will respond

If discrimination is found to have occurred, it is a breach of the Scentre Group Code of Conduct and may be considered misconduct or serious misconduct. Disciplinary action will be taken against any person who is found to have engaged in conduct that is discriminatory. Disciplinary outcomes may include an apology, counselling, transfer, termination, demotion or other forms of disciplinary action. Disciplinary action will also be taken against anyone who victimises or retaliates against a person who has complained of discrimination.

If you report discrimination, we will ensure that you are consulted about the steps Scentre Group takes in investigating or addressing the conduct. All complaints of discrimination will be treated seriously and any steps taken will respect confidentiality. In investigating complaints of discrimination, the desire of a complainant to preserve the confidentiality of their complaint will also need to be balanced with the need to address the issue formally to ensure that the Scentre Group workplace is free from discrimination.

All complaints of discrimination must be reported to Human Resources (regardless of the nature of the complaint) and you can do this directly or nominate someone to do this on your behalf. This is to ensure there is full transparency of any incidents of discrimination, which in turn could assist with identifying any potential patterns and/or education needs.

3 Recognising discrimination

Discrimination means any practice that makes a distinction between individuals or groups to disadvantage some and advantage others. Discrimination can happen either directly or indirectly.

Direct Discrimination occurs when a person is treated less favourably or unfavourably because they have a particular attribute; such as being of a particular gender, sexuality or age, of a cultural background or having religious beliefs or because they possess characteristics which are thought to relate generally to people of a particular status. For example, direct discrimination could occur as a “joke” or comment about any of these attributes, for example making negative comments about a person’s race or sexuality, or unfair treatment in the course of work on the basis of a particular attribute. Discrimination can also occur if decisions are made about recruitment, training, transfer and promotion opportunities and in terms and conditions of employment where people are treated less favourably or unfavourably as a result of one of the attributes listed below.

Indirect Discrimination occurs where there is a requirement (a rule, practice, policy or procedure) which, on its face, appears to be neutral and to treat everyone equally, but has an unequal or disproportionate impact on a person or people with a particular attribute and is unreasonable in the circumstances. For example, regularly and unreasonably having meetings at a time and/or location which makes it difficult for parents of young children or others with carer responsibilities to attend. This could also include people who may possess future attributes, such as a mother who is returning to work and may need to breastfeed in the future and makes a reasonable flexibility request to accommodate this. Indirect discrimination is not unlawful when the rule or policy is reasonable, having regard to the circumstances of the case.

At Scentre Group, in accordance with applicable law, discrimination based on any of the following attributes is unacceptable:

- age
- sex
- sexual orientation or sexual activity
- gender history, gender identity, gender expression, intersex status, transgender or transsexual status
- a disability, disease or injury, including work-related injury
- pregnancy or potential pregnancy
- breastfeeding
- marital status or relationship status
- family responsibilities, parental status or status as a carer
- race and racial hatred, colour, descent, nationality or ethnic background or immigrant status
- industrial activity, including being a member of an industrial organisation
- religion
- political opinion
- social origin
- medical record
- physical features
- an association with someone who has, or is assumed to have, one of these characteristics, for example being the parent of a child with a disability.

3.1 Discrimination and third parties

- It is important to note that discrimination in the workplace also extends to our dealings with third parties. Discrimination may occur when deciding:
- Whether or not to engage a person as an independent contractor. For example, by refusing to engage a woman as an independent contractor for reasons relating to her gender.
- When obtaining goods and services, including deciding the terms and conditions those services will be obtained. For example, by refusing to trade with a particular supplier due to their race.
- Providing goods and services, including deciding the terms and conditions those services will be provided based on a person's attributes. For example, refusing to provide a product to a person with a disability where their disability is irrelevant to the product's use, purpose or suitability.
- In deciding whether or not to lease business premises to someone, including the terms and conditions those premises are leased based on a person's attributes. For example, refusing to lease space to a particular person because of their political views.

4 Everyone has a role to play

Preventing and responding to discrimination in the workplace is a shared responsibility. This is consistent with our approach to our workplace health and safety obligations to protect each other from harm including psychological harm. In line with those existing obligations, Scentre Group is also required to make reasonable adjustments, where possible, to prevent discrimination and ensure that everyone is treated equally. An adjustment will be a 'reasonable adjustment' unless it would cause an employer an 'unjustifiable hardship' to make the adjustment.

Without exception, everyone is expected to lead by example and behave in ways that are consistent with this policy.

4.1 Leaders

- Promote discrimination prevention and early intervention as a leadership priority and ensure systems and processes are in place to support this. Each leader has a responsibility to ensure that their team is free from direct discrimination and indirect discrimination.
- Identify, address and educate their team to remove any behaviour that enables or condones discrimination, including tolerance generalisations and assumptions relating to certain categories of people, for example making assumptions during recruitment processes due to attributes like age and gender.
- Speak up when they see, know, suspect or anticipate the likelihood of discrimination and
- treat all complaints seriously, confidentially and with sensitivity.
- Create a psychologically safe environment that encourages people to raise concerns.
- Support an individual who is impacted and understand how they would like the issue to be managed.
- Prioritise the care and support of those impacted when responding to issues raised.
- Speak openly with teams and stakeholders about our policies on discrimination and likely consequences of engaging in discriminatory conduct.

4.2 Teams / individuals

- Behave in a way that creates a safe, respectful and inclusive environment.
- Speak up when they see, know, suspect or anticipate the likelihood of discrimination and treat any information they receive or provide in connection with an allegation seriously, confidentially and with sensitivity.

- Intervene in a way that is comfortable and, if safe to do so, address and stop the behaviour. This could be as simple as providing feedback about certain workplace practices, such as rostering people with particular religious beliefs on days of religious importance.
- If not comfortable to intervene, then speak with the impacted person or raise it with a leader or member of the Human Resources team.
- Ensure any person impacted is safe and check in on their wellbeing.
- Listen to the experience of any person impacted without judgement and understand how they would like to be supported.
- Participate in any enquiries or investigations.
- Keep details of the incident or investigation confidential.
- Provide access to the Employee Assistance Program.
- Engage with Human Resources in support of or on behalf of a person impacted so they can be given support.

5 Where and how discrimination may occur

5.1 Location

As the way we work has evolved and changed, so has the workplace in which discrimination can take place, including:

- in the workplace, including our centres, worksites and Support Office.
- online via technology and social media irrespective as to whether work resources were used.
- beyond the usual workplace and outside normal working hours, where there is a link to employment such as conferences, social events, business trips and after parties.

5.2 Relationships

Our work relationships are extensive which means the potential for workplace discrimination to occur between team members, including:

- other team members as well as contractors / consultants / temporary team members, service providers, retailers or other clients and customers.
- a team member and a potential team member.
- a team member and someone connected to the organisation for work purposes including volunteers.

For the purpose of this policy, “team member” extends to all Scentre Group employees, contractors and contracted workers of Scentre Group.

6 Frequently asked questions

Is discrimination against the law?

- In Australia, discrimination is unlawful under the following Federal statutes:
- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2001 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Workplace Gender Equality Act 2012 (Cth)
- Fair Work Act 2009 (Cth)

In addition, every Australian State and Territory has enacted anti-discrimination legislation including legislation to protect employees from unfair treatment at all stages in the employment relationship between employer and employee.

In New Zealand, the Human Rights Act 1993 and the Employment Relations Act 2000 prohibit discrimination and discrimination in employment.

If an allegation of discrimination is substantiated, what are the consequences?

Disciplinary action will be taken against any person who is found to have engaged in conduct which is discriminatory in the Scentre Group workplace. This may include a formal apology, counselling, transfer, termination, demotion or other forms of disciplinary action. Disciplinary action will also be taken against anyone who victimises or retaliates against a person who has complained of discrimination.

Who is liable for an act of discrimination?

You can be personally liable for an act of unlawful discrimination, as can Scentre Group. There are a number of remedies and penalties that can be applied by the courts, including significant fines.

How can I raise a concern where I just want the behaviour to stop, I don't want a formal investigation and I don't want them to lose their job?

Our goal is to listen to the wishes of any impacted person and follow their wishes where it is reasonable to do so. There are however, times when the circumstances of a discrimination complaint will require a formal investigation and/or disciplinary action to be taken against the person engaging in the conduct. Any decision to do so will consider your wellbeing, the seriousness of the behaviour and the impact on you and risk to the psychological and physical safety of others.

There are various avenues available for raising a concern and if you report any form of discrimination we will ensure that you are consulted about the steps Scentre Group takes in investigating or addressing the alleged misconduct. All complaints of discrimination will be treated seriously and any steps taken will respect confidentiality. If this is an early intervention, it could mean that we support you with some coaching on how to approach the person directly if that is something you wish to consider.

The best thing is to not hesitate about seeking some support as soon as possible so the behaviour can be stopped.

I am really impacted by the behaviour of another colleague – I’m not sure if its discrimination, what do I do?

If you’re experiencing behaviour that is making you feel uncomfortable, the important thing is to stop that behaviour regardless of whether it’s considered discrimination or not. We encourage you to talk to someone about the behaviour who can help support you in addressing it directly or reporting it. We suggest speaking with someone in your team you feel comfortable with, your leader or a member of the Human Resources Team.

We also want to ensure you feel supported and encourage you to reach out to someone sooner rather than later. You can also use our Employee Assistance Program to access their counselling services:

* For Australia: (AU) 1800 808 374 OR SMS 0439 449 876

* For New Zealand: (NZ) 0800 327 669 OR SMS 4267

Effective Date	01.12.2022
Approval Date	01.12.2022

Scentre Group Limited
ABN 66 001 671 496

Scentre Management Limited
ABN 41 001 670 579

Level 30, 85 Castlereagh Street
Sydney NSW 2000 Australia

RE1 Limited
ABN 80 145 743 862

GPO Box 4004
Sydney NSW 2001 Australia

RE2 Limited
ABN 41 145 744 065

scentregroup.com