

# MODERN SLAVERY STATEMENT 2023

## CEO message

Goodman supports the protection of human rights, and equity and fairness in our operations and supply chain. We acknowledge that modern slavery is a global and pervasive risk and that managing this risk is an ongoing responsibility.

Modern slavery is a serious form of exploitation. The term “modern slavery” refers to a range of serious human rights violations, including forced, bonded, trafficked and child labour. It arises in circumstances where coercion, threats, or deception deprive people of their freedom and right to select their own work.

Modern slavery spans all industries. We are conscious that some elements of the property and construction sector have an elevated modern slavery risk and have designed our modern slavery strategy in response to that risk. Our modern slavery strategy puts people at its centre. Our focus on the protection of the human rights of our people and workers in our supply chain is aligned with our values and our commitment to safety and sustainability. Our most significant modern slavery risks are within our supply chain which includes over 8,000 suppliers. Our approach to modern slavery assists us to respond to these risks and work with our suppliers and other stakeholders to mitigate them. If modern slavery practices or risks are identified, our response will be guided by what is in the best interests of potentially affected workers.

We acknowledge that identifying actual or potential instances of modern slavery demonstrates the effectiveness of our modern slavery processes and actions. It also facilitates provision of remedy to affected workers, including addressing root causes. Globally, in FY23, we have not identified any instances of modern slavery in our supply chain. We are committed to understanding our modern slavery risks, beyond our first tier suppliers with a focus on subcontractors engaged by our suppliers in FY24, and combatting modern slavery through effective partnerships and collaboration.

Our modern slavery strategy continues to mature year-on-year. Our continuous improvement approach has resulted in our adoption of targeted initiatives and measures in FY23, so that our processes and actions remain effective in preventing and remediating modern slavery.

**This Statement has been approved by the Goodman Group Boards (as defined in the section “Our structure”) on behalf of the reporting entities covered by this Statement on 18 September 2023.**



Greg Goodman  
Group CEO  
28 September 2023



Target 8.7  
End modern  
slavery,  
trafficking and  
child labour

SUSTAINABLE DEVELOPMENT GOALS



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**27.6M** **54%**

people in forced labour

of victims are women and girls

**1 IN 4**

victims are children

**'AN ESTIMATED 50 MILLION PEOPLE LIVE IN MODERN SLAVERY TODAY'**

Source: International Labour Organisation, The United Nations & Walk Free Foundation

## 2023 KEY PROGRAM HIGHLIGHTS

Our key highlights for 2023 were:

### **Global integration of our modern slavery commitments and regional consultation**

We continued to embed our human rights and modern slavery commitments and expanded our regional working groups in the regions in which we operate. We held over 30 modern slavery formal workshops for our regional working groups which include representatives from operational teams (developments and property services), procurement, legal and risk reinforcing our commitment to combating modern slavery through sharing best practice outcomes and expertise. Each region focused on further integrating some of our modern slavery program controls, enhancing their approach to: governance, risk assessment, due diligence, engagement, and remediation.

### **Building internal capacity through global operational and supplier standards and training**

We created global standards in relation to human rights, modern slavery and labour protection to provide guidance for all regions in relation to operational matters and supplier expectations. Our standards include our remediation pathway and a step-by-step approach to manage grievances and whistleblowing, providing clear channels for reporting concerns. Training was also provided with a focus on our people who regularly engage with suppliers.

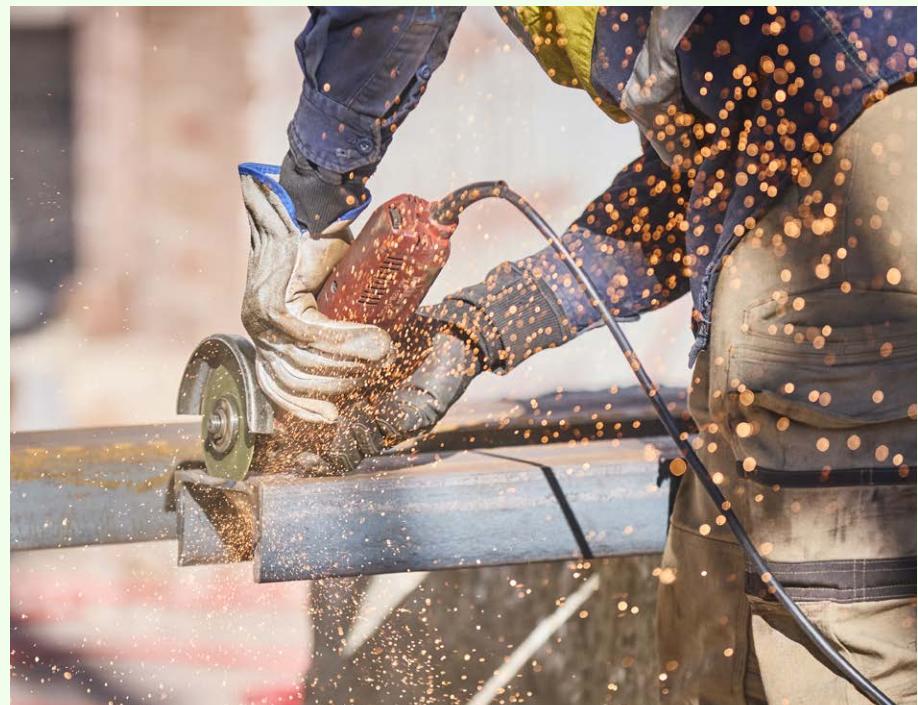
### **Enhancing supplier capacity building through awareness and collaboration**

To enhance supplier awareness, we developed a modern slavery factsheet which our regions can share with their suppliers. The factsheet explains what constitutes modern slavery. It aims to raise awareness on how to spot modern slavery and the expectations of our suppliers. To further improve supplier awareness, facilitate open dialogue and foster creative collaboration, we piloted one-on-one supplier workshops in Australia and The Hong Kong Specialist Administrative Region of the People's Republic of China (Hong Kong). These workshops served as a platform for meaningful discussions amongst our key suppliers, allowing for the exchange of ideas, perspectives, and best practices.

### **Targeted risk management actions in high risk sourcing categories and geographies to mitigate modern slavery risk.**

We refined our approach this year and focused on “at risk” areas of our supply chain and geographies and commenced implementing targeted measures, both management controls and operationally at ground level, to mitigate modern slavery risk. Two key measures are signage and onsite reviews.

- + In Brazil, Mainland China (China) and the US, signs are being installed across our developments to raise awareness of modern slavery and labour law compliance issues for workers on site and educate them about their rights, risks, and our reporting channels.
- + In Brazil, we have engaged third-party consultants (currently HR Assessoria e Projetos) to conduct specialised labour inspections to review site based general contractors and subcontractors for compliance with labour and safety regulations. These inspections are focusing on health and safety conditions at development sites and worker accommodation, as well as labour conditions and safety standards at our properties. No modern slavery instances or indicators have been identified as part of the reviews.



## About our Statement and reporting entities

This is Goodman's joint Modern Slavery Statement (Statement) for the financial year 1 July 2022 – 30 June 2023 (FY23) published in accordance with section 16 of the *Commonwealth Modern Slavery Act 2018* (the Act) and section 54 of the *Modern Slavery Act 2015* (UK).

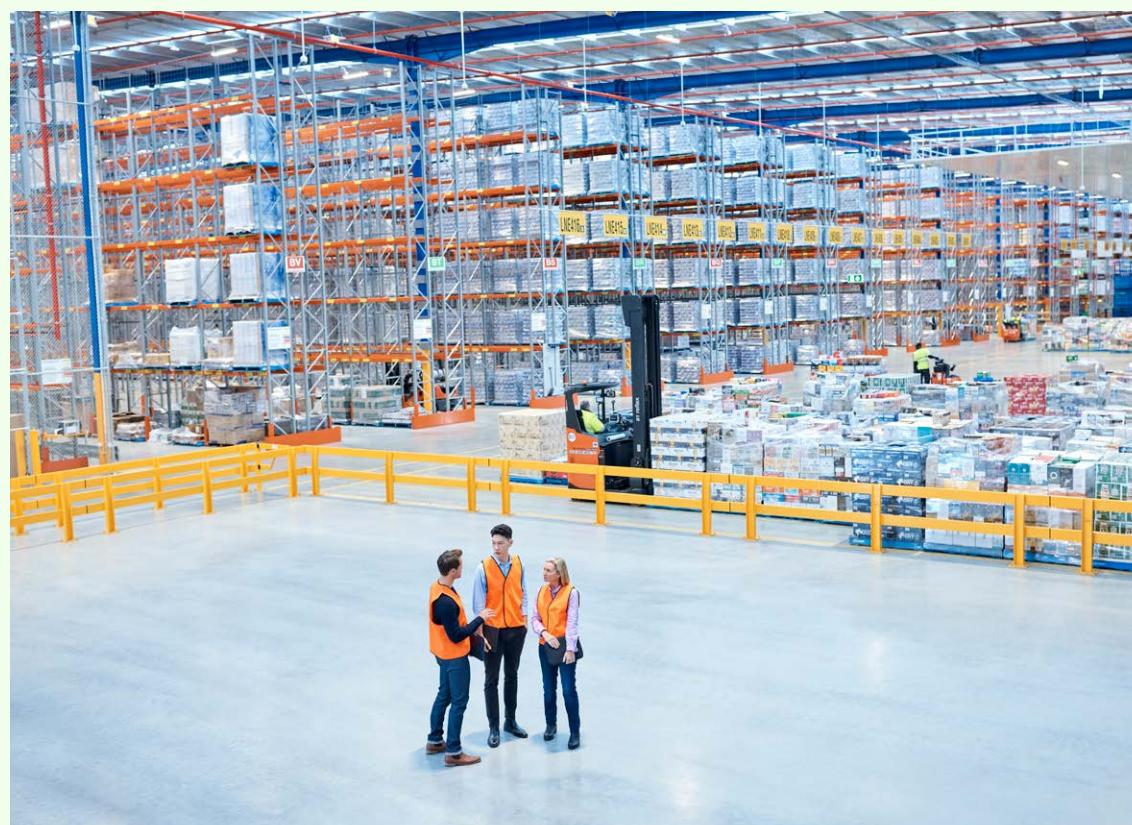
This Statement has been prepared for the multiple Goodman reporting entities outlined in the table below. It relates to these entities, and the entities they owned or controlled during the financial year ended 30 June 2023.

This Statement sets out the measures Goodman has taken to identify, manage and mitigate the risk of modern slavery practices in our global operations and supply chain and to maintain a responsible and transparent supply chain. References to "Goodman", "Group", "us", "we", or "our" in this Statement are references to the Goodman Group and each of the reporting entities unless specified otherwise.

This Modern Slavery Statement forms part of our overall corporate governance reporting including our [Annual Report](#), [Corporate Governance Statement](#) and [Sustainability Report](#).

In summary, having regard to the Group's stapling arrangements, the reporting entities for the purposes of this Statement are:

Entity	Reporting status
Goodman Limited (GL) ABN 69 000 123 071	Mandatory reporting entity in Australia
Goodman Funds Management Limited (GFML) ABN 48 067 796 641   AFSL Number 223 621 – the responsible entity for Goodman Industrial Trust (GIT) ARSN 091 213 839	Voluntarily reporting in Australia
Goodman Logistics (HK) Limited (GLHK) ARBN 155 911 149   Company No. 1700 359	Voluntarily reporting in Australia
Goodman Logistics UK Holdings Limited (GLUKH)	Mandatory reporting entity in the UK



## Our structure, operations, and supply chain

### Our structure

Goodman Group (Goodman or Group), is a triple stapled entity comprising the Australian company, Goodman Limited (GL), the Australian trust, Goodman Industrial Trust (GIT) and the Hong Kong company, Goodman Logistics (HK) Limited (GLHK). Goodman's stapled securities are listed and traded on the Australian Securities Exchange under the code GMG.

Goodman and their respective subsidiaries contributed to its total annual consolidated revenue as at 30 June 2023. Refer to the [Goodman Group Annual Report 2023](#) for further information.

### Governance

Goodman is committed to the highest standards of corporate governance and recognises that an effective corporate governance culture is critical to the long term performance and sustainability of the business.

The Boards of Goodman Group consist of the Board of:

- + GL
- + GFML as the responsible entity for GIT
- + GLHK,

(collectively, Goodman Group Boards).

The Boards of GL and Goodman Funds Management Limited comprise the same Directors while GLHK has a separate Board with some overlap.

The Goodman Group Boards oversee and regularly review our corporate governance framework to address our obligations as a responsible corporate entity, see [Goodman's Corporate Governance Statement 2023](#).

Goodman's approach to assessing and addressing human rights and modern slavery risk is managed under the same governance structure for managing Goodman's ESG risks and opportunities, as outlined below.





## GOVERNANCE STRUCTURE

### Goodman Group Boards

**Provides strategic direction and oversees the effective management and performance of Goodman. Holds the ultimate responsibility for approving our Modern Slavery Statement.**

### Board Committee: Audit, Risk and Compliance Committee

Responsible for overseeing the implementation and effectiveness of Goodman's risk, compliance and safety frameworks. Have delegated authority from the Goodman Group Boards to assist in the oversight of risk, compliance and safety matters, including our approach to modern slavery and human rights issues.

### Group Chief Executive Officer (CEO) and Management Committees

Responsible for the day-to-day management of Goodman and executing the Group's strategic objectives. Accountable for managing modern slavery and human rights risks. Management Committees for the Group CEO oversee Goodman's core corporate functions including risk, compliance, safety, sustainability, ESG and procurement. Have oversight of any actions to assess and manage modern slavery and human rights issues.

### Modern slavery working group

A cross-functional and multi-jurisdictional group including representatives from the business units of procurement, legal and compliance, risk and sustainability who are responsible for the development and implementation of policies, practices and reporting on modern slavery across our operations and supply chain. The modern slavery working group is overseen by an Executive Steering Group who provide oversight of strategy and initiatives. Progress against our modern slavery strategy is regularly reported to the Group CEO, Management Committees and Audit, Risk and Compliance Committee. This working group meets regularly to drive the continuous improvement in Goodman's approach to tackling modern slavery risk. The working group collaborates with the regional working groups and shares best practice outcomes and expertise across areas such as due diligence analysis, training and remediation (if required).

The above governance structure supports all entities owned and controlled by the Group and covered by this Statement.

## Our operations

Goodman is a global industrial property specialist group. We own, develop and manage high-quality, sustainable properties that are close to consumers and provide essential infrastructure for the digital economy, including warehouses and other logistics spaces.

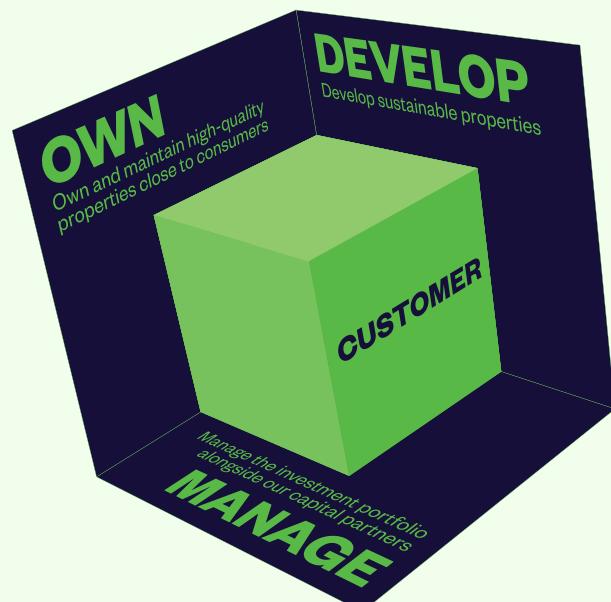
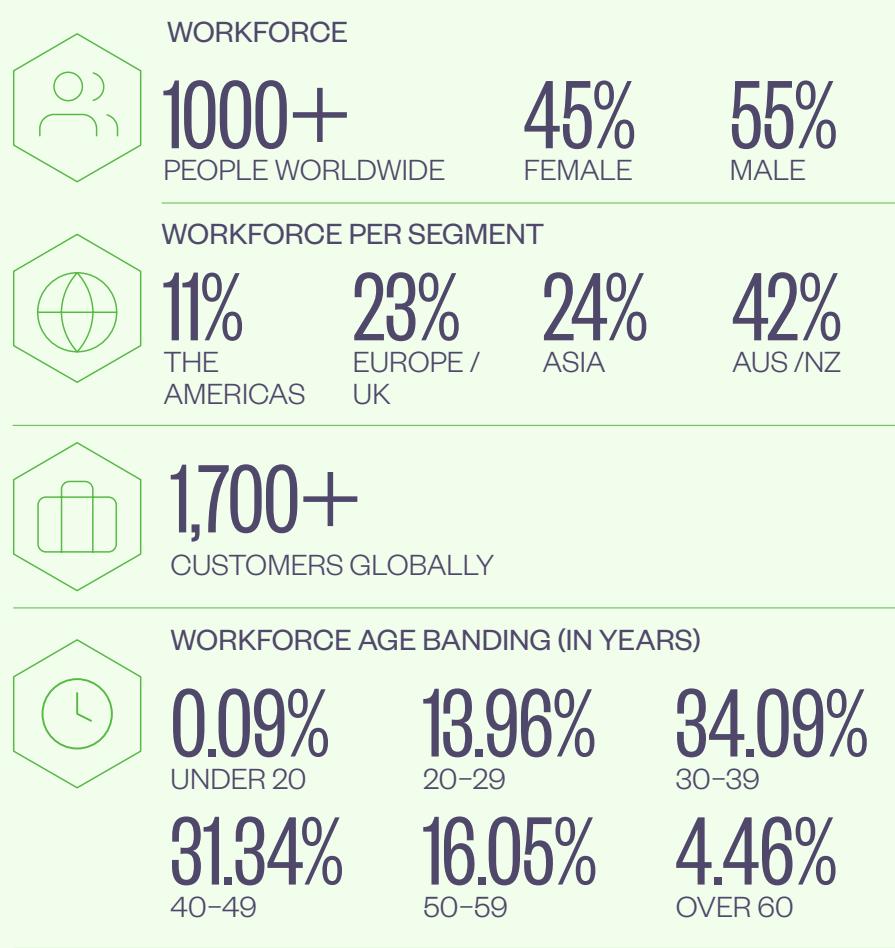
We have 432 properties located in key consumer markets in 14 countries across the Asia Pacific, Europe and the Americas (see further details below). With over AUD\$81 billion of assets under management at 30 June 2023, we are the largest property group listed on the Australian Securities Exchange and invest significantly alongside our capital partners in our investment partnerships.

We directly employ around 1,000 people worldwide and operate out of 29 offices. The majority of Goodman's people are employed on permanent contracts by subsidiaries operating in each country in which we are present. Employees, who we refer to as team members, perform a diverse range of professional job functions including property services, asset management, development and project management, investment management, human resources, information technology, risk management, legal, compliance, company secretarial and custodial services, marketing, stakeholder relations, finance, tax, valuations and treasury functions.

Goodman continues to have the people, scale, expertise, infrastructure and capital to develop long term relationships with customers and partners around the world. We have more than 1,700 customers across the e-commerce, logistics, retail, consumer goods, automotive, pharmaceutical and technology industries.

Additional information about Goodman can be found on our website at

[www.goodman.com](http://www.goodman.com).



Goodman's "Own Develop Manage" model focuses our business on our customers' current and future needs. We own and maintain high-quality properties close to consumers, we develop sustainable properties, and we manage our global investment portfolio. We work alongside our capital partners, which include sovereign wealth, pension and large multi-manager funds. In each market, our dedicated local teams take care of all aspects of property asset and investment management, ensuring a high level of customer service.

## GLOBAL PRESENCE

### OUR GLOBAL NETWORK

**\$81.0bn**

ASSET UNDER MANAGEMENT  
(AUM)

**432**

PROPERTIES

**14**

COUNTRIES

### AUSTRALIA / NEW ZEALAND

**\$33.9bn** **189**

AUM

PROPERTIES

### ASIA

**\$24.7bn** **78**

AUM

PROPERTIES

### CONTINENTAL EUROPE / UK

**\$11.5bn** **135**

AUM

PROPERTIES

### THE AMERICAS

**\$10.9bn** **30**

AUM

PROPERTIES

Current Goodman global presence. As at 30 June 2023 (Australian currency)

### Our supply chain

Our supply chain consists of small, medium, and large-scale suppliers who we work with to help deliver our global property development, property management and funds management activities. Goodman has established extensive supply chain relationships across each of its operating regions. We engage extensively with our supply chain throughout the lifecycle of properties, from initial development through to construction, operation and management.

Goodman directly engages over 8,000 suppliers globally to provide goods and services for our business, with an annual spend of approximately AUD\$4.8 billion across three key areas of our business being asset management, developments and operational/corporate. There has been a marginal increase in supplier numbers and supplier spend from FY22. Further details of our supply chain follow.

### Asset management

Goodman's global portfolio consists of 432 properties with a value of AUD\$81 billion as at 30 June 2023. Our suppliers involved in the ongoing maintenance of our properties include cleaning, security services, waste management, heating, ventilation and air conditioning services (HVAC), fire safety, plumbing, landscaping and repair and maintenance.

### Developments

Development of new properties and re-development of existing properties with work-in-progress of AUD\$13 billion as at 30 June 2023. This encompasses the development process, from sourcing property for our customers, master planning, architecture, design and project management. Goodman does not undertake construction in its own right. We appoint general contractors' for the construction of our developments, who are also responsible for our development sites and supplying construction materials directly or through subcontractors. Goodman may specify the type of materials used in construction but does not specify the source or origin of materials to be used in construction as this is not our expertise and is at the discretion of the general contractors and their subcontractors. Our focus therefore is to create awareness and education for our general contractors on the potential risks when sourcing materials. General contractors also contract with specialist subcontractors for the supply of construction labour and materials.

### Operational and corporate

Operating activities to run our business including professional and financial services, information technology equipment and support, office stationery and furniture, marketing merchandise, and travel.

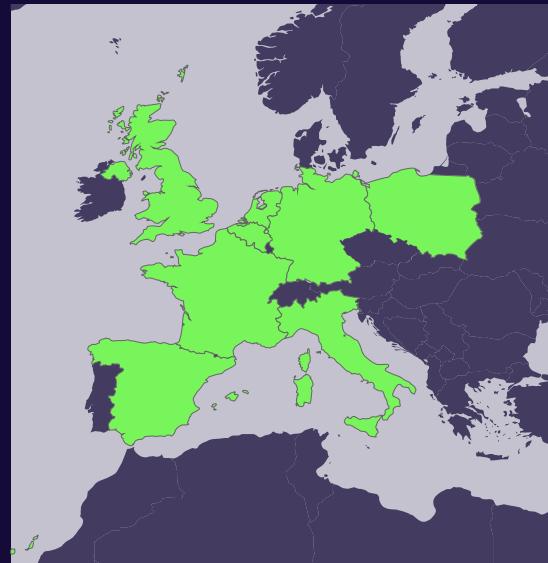
## FIRST TIER SUPPLIER LOCATION AND SUPPLIER SPEND



### THE AMERICAS

<b>\$664M</b>	<b>\$85M</b>
SUPPLIER SPEND	ASSET MANAGEMENT
<b>1096</b>	<b>\$395M</b>
FIRST TIER SUPPLIERS	DEVELOPMENTS

**\$184M**  
CORPORATE



### EUROPE/UK

<b>\$594M</b>	<b>\$111M</b>
SUPPLIER SPEND	ASSET MANAGEMENT
<b>2678</b>	<b>\$383M</b>
FIRST TIER SUPPLIERS	DEVELOPMENTS

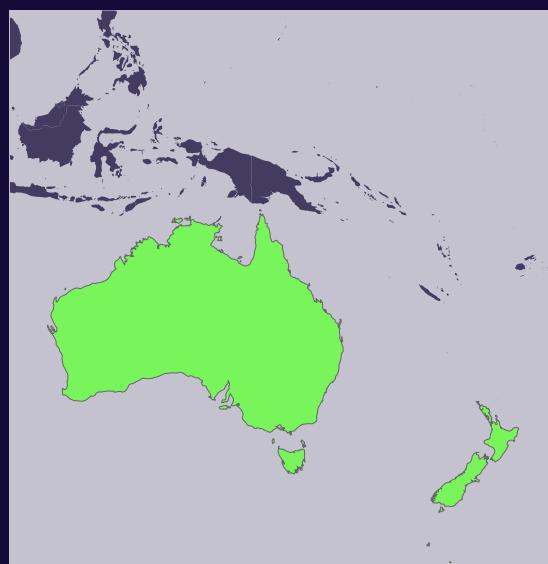
**\$100M**  
CORPORATE



### ASIA

<b>\$1.7BN</b>	<b>\$241M</b>
SUPPLIER SPEND	ASSET MANAGEMENT
<b>2080</b>	<b>\$1.1BN</b>
FIRST TIER SUPPLIERS	DEVELOPMENTS

**\$359M**  
CORPORATE



### AUSTRALIA/NZ

<b>\$1.9BN</b>	<b>\$689M</b>
SUPPLIER SPEND	ASSET MANAGEMENT
<b>2331</b>	<b>\$856M</b>
FIRST TIER SUPPLIERS	DEVELOPMENTS

**\$330M**  
CORPORATE

### TOTAL

<b>\$4.8BN</b>
SUPPLIER SPEND
<b>8185</b>
FIRST TIER SUPPLIERS
<b>\$1.1BN</b>
ASSET MANAGEMENT
<b>\$2.7BN</b>
DEVELOPMENTS
<b>\$973M</b>
CORPORATE

## Modern slavery risks in our operations and supply chain

In this section we describe how we have developed our understanding of modern slavery risks in our operations and supply chain. Our analysis has included:

**1. Inherent industry risk:** the risk factors and common modern slavery practices in property and construction.

**2. Goodman specific risks:** risks specific to Goodman's operations and supply chain which includes an analysis of geographic risk across the regions in which we operate.

As explained further below, we assess our risks against the United Nations Guiding Principles on Business and Human Rights (UNGPs) continuum of harm, which also guides our remediation approach (if required). We have defined "risk" as circumstances where people are experiencing or are exposed to modern slavery.

### Inherent risks in the property and construction industry<sup>1</sup>

Globally, property and construction are considered to be high risk sectors for modern slavery. Some elements of these sectors face an elevated risk of modern slavery as a result of factors such as:

- + High demand for workers vulnerable to exploitation e.g. use of base-skilled, low wage, contract and migrant workers
- + Business models relying on high levels of outsourcing including labour recruitment and the use of subcontractors
- + Long and complex supply chain for building materials including raw materials sourced from high risk geographies with a history of forced, bonded and child labour
- + Cost driven sectors relying on low margins and tight project timelines.

Responding effectively to modern slavery risks in property and construction requires us to first understand the types of exploitative labour practices and breaches of human rights that enable modern slavery to occur so we can prioritise addressing the greatest risks to people.

The common modern slavery practices and red flags observed in property and construction are:



### Goodman's assessment of our modern slavery risks

#### Risks in our operations (direct workforce)

In FY23, the modern slavery risks in our operations and direct workforce remained very low with regards to forced, bonded or child labour and other exploitative labour practices.

Goodman's workforce is located across the Americas, Europe/UK, Asia and Australia/NZ. Our people globally are skilled professionals providing predominantly office-based services. The majority of our people are employed directly on permanent contracts, with only 1% of our workforce being contractors working in professional roles. We recognise that in some contexts, contract (non-permanent) workers are more vulnerable to exploitation, however all our people are paid in accordance with applicable industrial relations laws. Permanent employees, both full-time and part-time, regardless of position are eligible to participate in short term and long term incentives.

Goodman makes the health and wellbeing of our people a priority including offering wellbeing programs (such as counselling) and flexible working models. We have a comprehensive set of policies (see page 20) that contribute to a safe and fair working environment including the ability to raise a concern about any unethical or illegal conduct, an unsafe work practice or a human rights issue.



#### GOODMAN WORKFORCE

93%  
FULL TIME

6%  
PART TIME

1%  
CONTRACTOR

1. KPMG Property, construction and modern slavery guide: <https://kpmg.com/au/en/home/insights/2020/08/property-construction-modern-slavery-practical-guide.html>

## Risks in our supply chain

In FY23, we re-confirmed the risks of modern slavery in our supply chain having regard to modern slavery data through internal risk assessments and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and the Walk Free Foundation: Global Slavery Index 2023.

We have identified the following attributes which increase vulnerability in our global supply chain:



Vulnerable populations	High risk geographies	High risk business models	High risk product and service
<p>Reliance on vulnerable populations</p> <p><i>Examples: migrant/refugee workers or minorities, base-skilled or contract/temporary workers for labour in construction, manufactured products, raw materials, cleaning, security services, maintenance and landscaping.</i></p>	<p>Higher risk geographies where there is lack of regulation or enforcement, lower human rights standards or prevalence of corruption and criminal organisations.</p> <p><i>Examples: raw materials used in construction (e.g. bricks, steel and concrete), manufactured products (e.g. polysilicon for solar panels, electrical and HVAC), corporate merchandise and equipment (e.g. garments and IT equipment) and the transport and delivery of these goods (e.g. seafarers).</i></p>	<p>Business models structured around high risk practices such as the use of outsourcing, subcontracting and third party labour hire agencies resulting in low visibility of labour practices in the supply chain and operating in price competitive and low margin markets.</p> <p><i>Examples: subcontracting for cleaning, security, maintenance and third party construction labour.</i></p>	<p>Raw materials for property and construction with dangerous and insecure working conditions.</p> <p><i>Examples: raw materials used in construction (e.g. bricks, steel and concrete) and manufactured products (e.g. polysilicon for solar panels, electrical and HVAC).</i></p>

Source: <https://kpmg.com/au/en/home/insights/2020/08/property-construction-modern-slavery-practical-guide.html>

Applying the identified attributes we mapped our supply chain against the key risk factors of vulnerable workforce, business model and geographic location to determine the workers more inherently likely to face modern slavery risk. Our regional teams are using their own tools to assess risks based on specific geographical and industry-related factors in the countries they operate in.

Our assessment also categorised procurement spend into high risk supplier categories. These suppliers were then evaluated by a number of different tools (questionnaire, supplier onboarding and audit) to understand various risk factors such as labour rights, fair working conditions, health and safety practices, human rights, and governance.

## RISK FACTORS

Supply chain	Vulnerable workers	Business model	Geographical location and product risk
Developments (third party construction labour and construction materials)	+ Suppliers using base-skilled, migrant workers at times without knowledge of the primary language in the relevant country or with visa insecurity for construction labour and raw materials extraction, processing and manufacturing and transport and delivery.	+ Tight deadlines + Workers recruited by subcontractors using labour hire providers and casual labour + Recruitment fees may be charged + Low profit margins + Extensive and complex supply chains with lack of visibility and transparency over supply chains for construction materials (bricks, concrete and steel) and manufactured products which require multiple components (e.g. solar, HVAC and electrical) including transport and delivery.	+ In some regions, there are varied regimes, informal economies and lack of unionisation + Production and sourcing of raw materials for construction (bricks, concrete and steel) and manufactured products (including solar) from jurisdictions with low human rights standards for extraction, processing and manufacturing and transport and delivery + Based on vulnerability, prevalence and government response there are greater potential risks of exploitative labour practices in Brazil and China.
Asset management (outsourced cleaning, security, maintenance and landscaping)	+ Suppliers using base-skilled, casual and migrant labour for cleaning, landscaping, maintenance and security services.	+ Engaged in a highly competitive market through outsourced agreements with suppliers for cleaning, landscaping, maintenance and security services + Low profit margins.	+ In all regions, there are risks in relation to base-skilled, casual and migrant labour for asset management + Based on vulnerability, prevalence and government response there are greater potential risks of exploitative practices in Brazil and China.
Operational and corporate	+ Suppliers using base-skilled workers + Outsourced offshore corporate suppliers that use local workers.	+ Low profit margins + Local workforce recruited by the offshore supplier.	+ Production and sourcing of marketing merchandise, office-related products and IT and telecommunications equipment from higher risk geographies and those with weaker labour laws.

Source: Global Slavery Index | Walk Free

Source: Global Slavery Index | Walk Free

## Focusing on first tier suppliers in high risk sectors

In FY23, we engaged 645 suppliers in high risk sectors globally (8% of total global suppliers) representing AUD\$2.11 billion in supplier spend in the categories of developments, cleaning, security and landscaping. These categories are our focus when addressing modern slavery risks in our supply chains. The chart below shows the division of spend for each category.



**97%**  
DEVELOPMENTS  
(\$2.05 BILLION)



**3%**  
ASSET MANAGEMENT  
(\$64 MILLION)  
- Landscaping \$20 million  
- Cleaning \$15 million  
- Security \$29 million

## Identifying our modern slavery risks and response using the UNGPs continuum of involvement

In developing our risk based response, Goodman considers the UNGPs continuum of involvement to assess our modern slavery risks and determine how we will respond depending on our relationship to the harm – that is whether we have caused, contributed to or are directly linked to the harm.

Goodman prioritises our modern slavery risks by considering the greatest risk to people, our level of influence and our ability to use leverage to minimise harm and create meaningful change.

### Our relationship to harm:

- + **Caused:** we cause harm where activities (or omissions) in our operations result in harm e.g. exploiting our direct workers.
- + **Contributed:** we contribute to harm when activities (or omissions) in our operations or supply chain significantly facilitate, enable or incentivise a third party to cause harm e.g. contracting with a supplier with unrealistic project costs and milestones which can only be met using exploited labour.



+ **Directly linked:** we are directly linked to harm caused by a third party if the harm is linked to our operations and supply chain, including products and services, through the business relationship e.g. our supplier engages a subcontractor to source building products from suppliers who source these products from overseas jurisdictions with low human rights standards for extraction and processing that may include the use of forced labour.

### Our remediation approach:

- + When Goodman **causes or contributes** to a negative human rights impact, we are committed to preventing the action causing the harm, using influence to mitigate any harm, and providing for, or co-operating in, the remediation of any individuals who have been impacted and the impact of this on the relationship with our supplier.
- + When we are **directly linked** to modern slavery (such as potential exploitation in our raw material supply chain or through a supplier relationship) we will seek to prevent or mitigate any adverse human rights impacts but acknowledge that our ability to use influence or remediate the situation may be more difficult due to how deep in our supply chain the issue is occurring.

## Goodman's risk based approach

Goodman's modern slavery risk priorities focus on risks to people, our ability to use influence to create meaningful change and remediability of potential impacts. Based on the above analysis, Goodman's risk based approach is as follows:

- + Goodman has not identified that we are **causing** modern slavery in our direct operations so this is not a key focus area.
- + Goodman is not aware of having **contributed** to modern slavery. We accept that this is possible due to high demand for based-skilled workers and the fact that many of our projects are driven by price and tight timelines. This is a key risk area that Goodman is seeking to manage through its various programs.

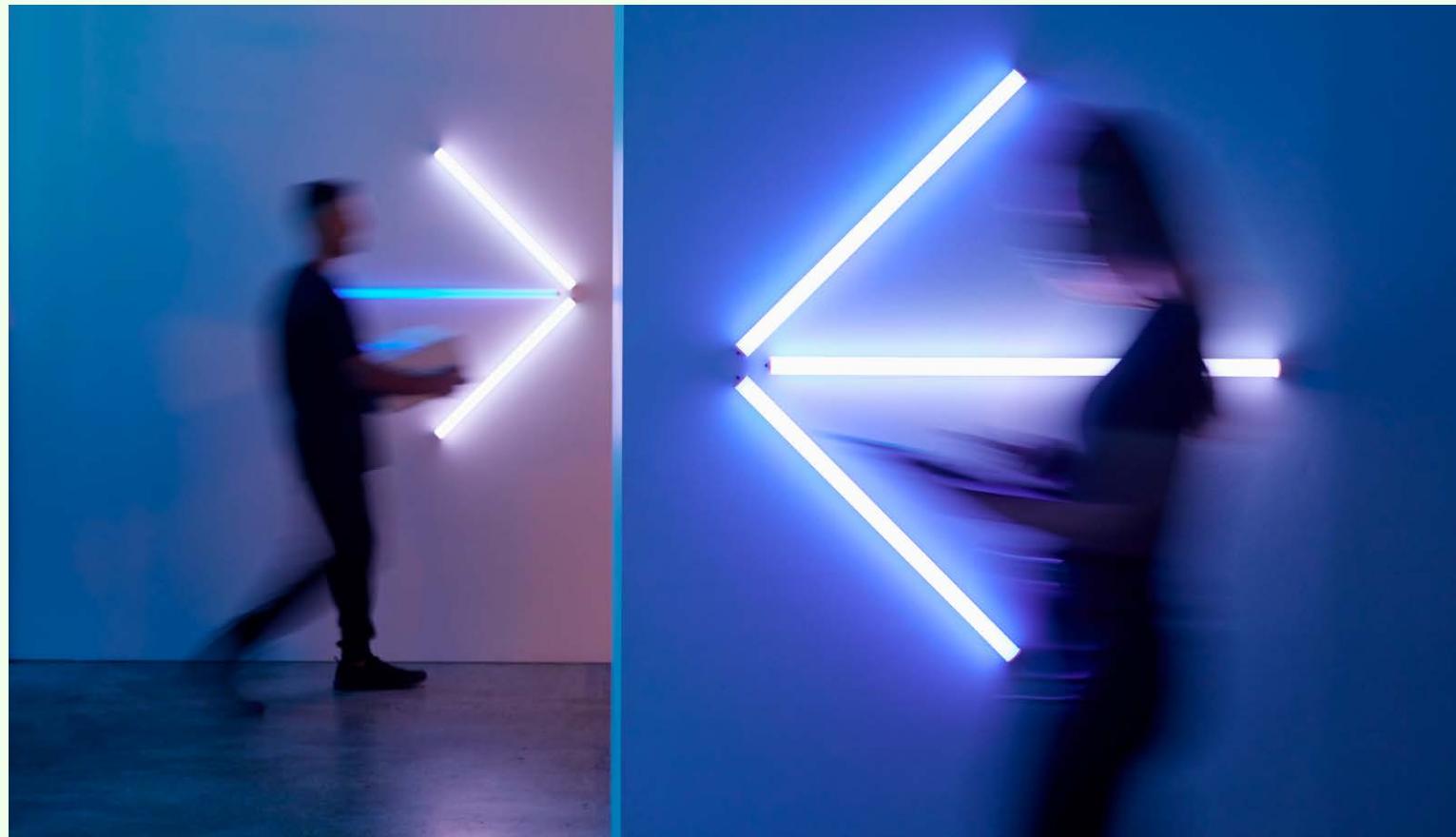
Goodman's approach to managing this risk is multipronged and described under the subheading "Actions taken to assess and address modern slavery risks, including due diligence and remediation" below. We expect our suppliers to identify and respond to any modern slavery or human rights risks and be willing to work with Goodman to remediate any issues. Where suppliers are not willing to remediate or there are significant and sustained breaches then termination of the contract or loss of future work may occur.

- + Goodman is most at risk of being **directly linked** to human rights harms in our extended supply chains including our second tier suppliers and beyond who

source raw materials such as bricks, cement and manufactured products from higher risk geographies associated with insecure working conditions, forced labour and child labour. These products involve both domestic and imported elements which adds complexity in mapping and monitoring supply chains. There is risk in this extended supply chain but there are also limitations in terms of influence, alternative supply and varying government responses including product bans.

Goodman manages this risk in a variety of ways. Our approach differs between our regions, but includes educating our people, suppliers and workers on our sites in relation to modern slavery, the availability of grievance mechanisms and the selection and engagement with our first tier suppliers, with whom we have the greatest control and influence. Our various interactions with our first tier suppliers are designed to develop their risk awareness and encourage them to improve their understanding of their supply base so that they can best manage risk and influence within their direct supply chain. This includes sourcing services, materials and products from ethical suppliers who comply with relevant legislation and seek to avoid modern slavery practices. For further details, see "Actions taken to assess and address modern slavery risks, including due diligence and remediation" below.





## Actions taken to assess and address modern slavery risks, including due diligence and remediation

### Our approach

Goodman has adopted global modern slavery standards that apply to all regions to safeguard human rights and combat modern slavery. This approach provides a consistent and standardised way to assess and address risks in each region. Each region has adopted and implemented these standards, customising them to align with local risks and practices. Our standards encompass essential aspects of our human rights and modern slavery program controls, reflecting our global commitment.

### Key challenges

The implementation of modern slavery standards regionally presents several key challenges. One challenge is variations in legislative requirements and responses or absence of legislation in some regions.

Not having a consistent legal framework across regions makes it difficult to enforce and regulate measures against modern slavery uniformly. There are also varying levels of maturity and awareness across the regions in which we operate and our supply chain, which can impede the adoption of effective strategies and require comprehensive education and training programs to increase supplier understanding. Cultural and socio-economic disparities also influence the response to modern slavery, requiring tailored regional approaches. Despite these challenges, Goodman has worked to establish global operational standards and adopted a collaborative approach that acknowledges and addresses regional nuances to overcome obstacles and promote the effective implementation of these modern slavery standards.

## MODERN SLAVERY LEGISLATIVE RESPONSE IN GOODMAN REGIONS



### Goodman regulatory landscape

- Regulation in operation
- Regulation emerging
- No current regulations

Note: there are other regulations not detailed above as they do not apply to Goodman

## Our 2023 actions

Our 2023 actions were defined by first identifying risks to people (which is at the centre of our approach) and then considering where our influence could make a difference. Our approach has focused on both foundational measures and other more complex risk management actions. The pillars of our framework are repetition and awareness of key messaging, greater engagement with our people and suppliers and confirming that our grievance mechanisms are both trusted and accessible. Our key actions are detailed below.

### Implementation of our Sustainable Sourcing Framework

The Sustainable Sourcing Framework (Framework) was developed by Goodman in 2022 to offer strategic guidance in accomplishing our global sourcing and supply chain objectives. This Framework aims to safeguard human rights throughout our supply chain, minimise the risk of modern slavery, and help support the goals of our 2030 Sustainability Strategy.

The Framework plays an important role in mitigating the risk of modern slavery within our supply chain as follows:

- + **Open dialogue:** the Framework emphasises the need for transparency and open dialogue with our suppliers to map their supply chain, identify potential risks, and eliminate any instances of modern slavery in their extended supply chain. By gaining visibility into the supply chain we can identify and address any potential risks or instances of modern slavery. The Framework highlights the importance of collaboration and engagement with suppliers, sharing best practices, and working on solutions together so we can collectively address the issue of modern slavery within supply chains and drive systemic change.

- + **Supplier evaluation and selection:** the Framework guides Goodman in evaluating and selecting suppliers based on their commitment to ethical practices. It encourages Goodman to engage like-minded suppliers who have strong policies and procedures in place to address modern slavery. This evaluation process includes assessing suppliers' adherence to labour standards, human rights, fair working conditions and workers' rights.



- + **Capacity building and training:** the Framework implementation includes providing training and capacity building initiatives for both internal teams and suppliers. This includes educating our people and suppliers about modern slavery, its indicators, and reporting mechanisms. By raising awareness and building knowledge, we can empower our suppliers and their workforce to identify and respond to instances of modern slavery.
- + **Contract precedents and policies:** the Framework underscores the need to have in place and regularly update policies, framework documentation and contract precedents to combat modern slavery. These measures establish clear guidelines which are communicated to our suppliers and foster a shared understanding of ethical sourcing practices, ultimately mitigating the risk of modern slavery.

The key actions undertaken with respect to our Framework in FY23 focused on engaging with both our internal and external stakeholders to enhance their understanding of our sourcing and supply chain objectives and expectations. To facilitate this process, regional internal working groups were formed to assist with the implementation of the Framework in all the regions where we have a presence. The specific actions taken to implement the Framework are described below.

### Update of procurement policies

In FY23, we took steps towards expanding our procurement policies to align with the recently established Framework to consider environmental, social, and governance objectives within our procurement processes. By incorporating these objectives into our policies and Statement of Business Ethics (Supplier Code of Conduct), we aim to prioritise and normalise sustainability, social responsibility, and ethical practices throughout our procurement activities.

### Contractual inclusions

During the year, we conducted a review of all our contract templates and precedents to confirm they included references to our Statement of Business Ethics. This statement serves as our supplier code of conduct, which outlines our expectations regarding modern slavery and human rights, amongst other matters. It is a guiding document that governs our dedication to conducting our business ethically.

In China and Hong Kong, we implemented additional measures by including signed declarations from our suppliers regarding

human rights and labour protection in our contract templates. These declarations serve as commitments from our suppliers to uphold the principles of human rights and labour protection as outlined in our guidelines.

In Brazil, all contracts contain specific clauses that obligate the supplier and their subcontractors to make representations regarding modern slavery including keeping records of modern slavery incidents, to establish grievance mechanisms and ensuring subcontractors include modern slavery clauses in their own contracts relating to child labour and slavery practices.

By incorporating these provisions into our contract templates and securing signed declarations from suppliers, we aim to strengthen our commitment to promoting and safeguarding human rights within our supply chain. It also assists to align our business partnerships and procurement activities with our values and principles, providing an added layer of assurance that ethical standards are being upheld.



## Modern Slavery Operational and Supplier Standards

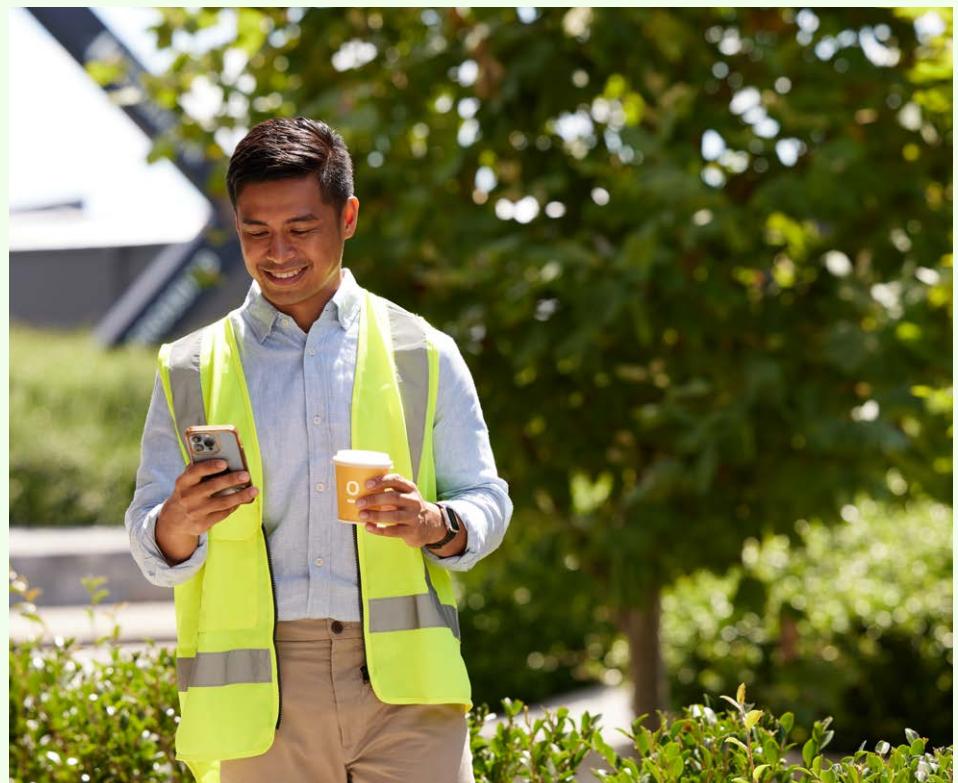
This year we established global standards and guidelines to address human rights, modern slavery, and labour protection in the Modern Slavery Operational and Supplier Standards (Modern Slavery Standards or Standards), which are an integral part of our overarching Sustainable Sourcing Framework.

To develop our Modern Slavery Standards, our modern slavery working group collaborated with regional working groups across Goodman. This group received specialised training with emphasis on understanding the grievance process and, where required, our remediation process in relation to modern slavery. This inclusive approach allowed for comprehensive consultation and integration of diverse perspectives in shaping our approach to tackling modern slavery within our supply chain and operations.

The Modern Slavery Standards encompass a range of key areas, including accountability for modern slavery issues, onboarding processes, audit and compliance procedures, stakeholder engagement approaches, training initiatives, remediation pathways, and supplier and regional expectations. By outlining these standards and guidelines, we aim to ensure that all our operations align with best practices and effectively tackle the issue of modern slavery.

Some of the key supplier expectations captured in the Standards are:

- + No forced labour and no worker should pay for a job
- + Workers should be treated and paid fairly for the work that they do
- + Migrant workers shall have the same entitlements as local workers as stipulated by local law and any commissions or recruitment fees in connection with the employment of migrant workers must be covered by the employer
- + Protecting children from hazardous work, slavery and trafficking
- + Respecting the rights of workers to freedom of association
- + Workers should be able to raise grievances safely
- + Working conditions and health and safety



- + Where subcontracting is permitted, suppliers must have adequate processes in place for properly managing subcontracting to ensure that subcontractors operate in accordance with our standards
- + Responsible sourcing of materials.

## Regional progress

We established regional working groups comprised of Senior Management, procurement, legal and risk, as well as dedicated property services and development representatives. These groups convened regularly to develop region specific strategies. Additionally, we conducted over 30 formal modern slavery workshops across all our regions which resulted in the implementation of policies and measures to address modern slavery risks within our operations and supply chain.

Each region implemented targeted actions in key areas such as governance, risk assessment, due diligence, engagement, and remediation. This regionalisation of approach ensured that our efforts to combat modern slavery were tailored to reflect the specific needs and circumstances of each region. Regional progress was reported to the modern slavery working group and to the Executive Steering Group.

## Our progress on our commitments

### Governance – policy framework

Goodman's approach to modern slavery compliance and its practical effectiveness is aligned with a comprehensive set of global policies which reinforce our values and ethical expectations of our people and suppliers.

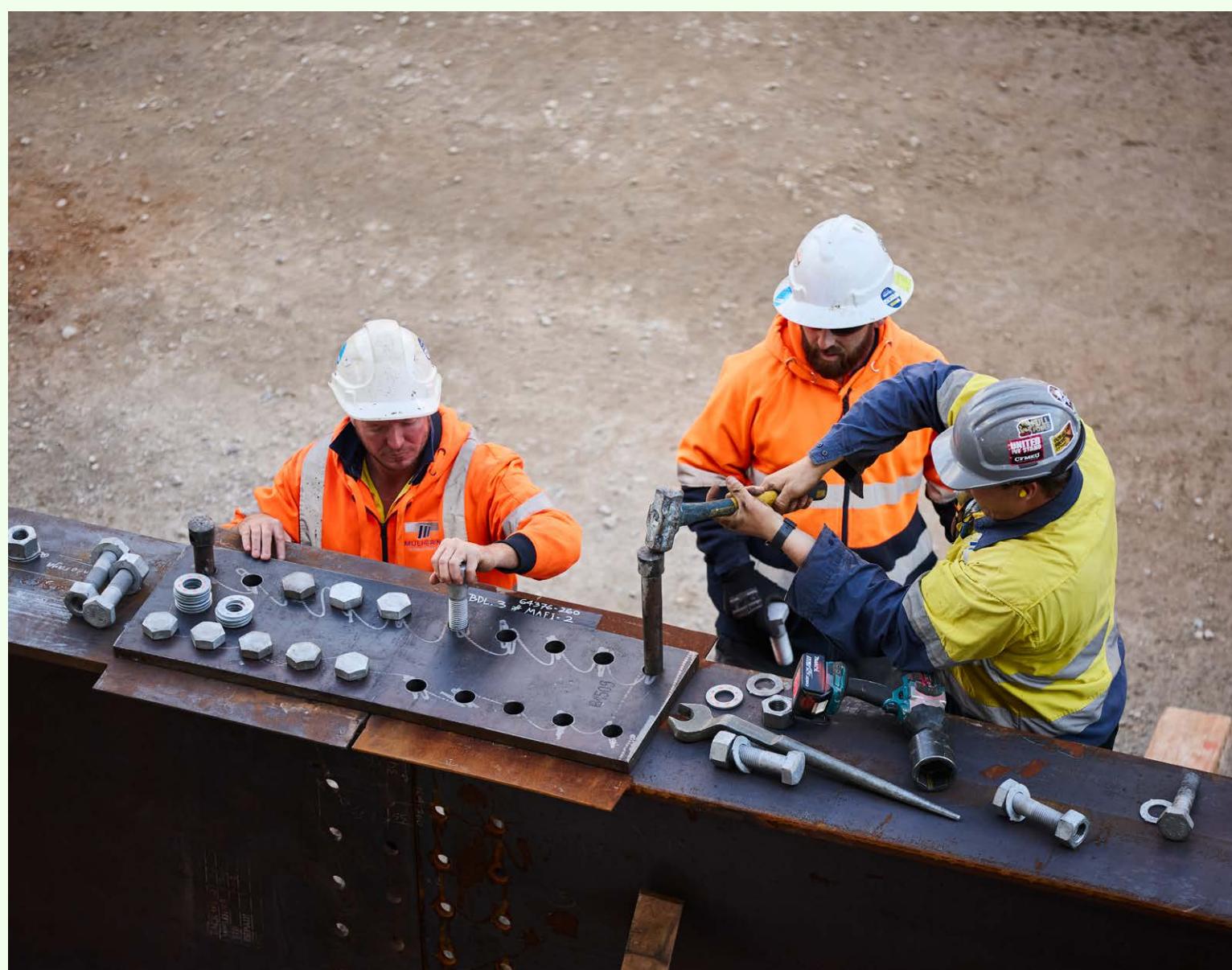
In FY23 our key policies were reviewed to confirm, amongst other things, they are still aligned with our focus on modern slavery and human rights. The key updates included the Sustainable Sourcing Framework being implemented, changes were proposed to regional procurement policies and the Modern Slavery Operational and Supplier Standards being introduced (as detailed above). There were no significant changes proposed to the other policies and the review concluded that the policies adequately reflect our stance on human rights and modern slavery.

Our policy framework is actively communicated and enforced and seeks to ensure that our people and suppliers understand our expectations around protecting human rights, preventing modern slavery and labour exploitation and can recognise when to raise a concern. The following policies are the most relevant to human rights and modern slavery:

Policy – Operations	Purpose
Code of Conduct	Provides the ethical and legal framework for our people in conducting Goodman's business. The Code requires compliance with all legal requirements, ethical expectations and fundamental human rights and details the whistleblowing mechanisms in place to report any ethical concerns including in relation to modern slavery and human rights.
Workplace Bullying and Harassment Policy	Articulates our expectations in relation to the behaviour of our people and our commitment to providing a safe, respectful and inclusive workplace.
Inclusion and Diversity Policy	Goodman fosters a work culture of inclusivity and diversity and focuses on the wellbeing, health and safety of our people and our contractors. Goodman supports health and wellbeing including through flexible working arrangements as well as learning, development and equal opportunities
Anti-Bribery and Corruption Policy	Outlines our commitment to complying with laws and regulations addressing fraud, bribery and corruption in each country in which we conduct business.
Ethical Concerns Policy (“Whistleblower” Policy)	An anonymous reporting channel for anyone (including whistleblowers) to raise concerns about human rights or modern slavery concerns.
Modern Slavery Operational and Supplier Standards	Global standards and guidelines to address human rights, modern slavery, and labour protection by detailing key operational expectations.
Policy – Supply Chain	Purpose
Statement of Business Ethics (Supplier Code of Conduct)	Communicates the expectations and minimum standards we place on our suppliers with regard to ESG risks and impacts, including complying with all applicable legislation in relation to labour practices and respecting and supporting human rights. Made available through our website and contractual engagements.
Procurement Policy	These regional policies provide guidance and direction for Goodman's tendering and procurement practices and are being updated to include Goodman's commitment to responsible supply chain management.

Policy – Supply chain	Purpose
Sustainable Sourcing Framework	Goodman has developed a Sustainable Sourcing Framework to set expectations for our team when engaging suppliers in relation to responsible sourcing and human rights and details our grievance procedures including assessment, investigation and remediation.
Ethical Concerns Policy	As above, this establishes the reporting mechanisms for suppliers for any grievances including in relation to human rights or modern slavery concerns. Concerns can be raised anonymously.
Global Safety Framework	Goodman is committed to the prevention of harm in our operations. Our Global Safety Framework sets a minimum standard of safety that we require across our global operations in line with Goodman's risk appetite statement.
Modern Slavery Operational and Supplier Standards	Global standards and guidelines to address human rights, modern slavery, and labour protection by setting out our supplier expectations.

Goodman's Corporate Governance Statement and policies are available [here](#).



## Gender pay review

We continue to maintain internal processes and controls to comply with our legal and contractual obligations and to manage entitlements relating to our people. Annually, Goodman undertakes a gender pay review to identify any conscious or unconscious bias and to improve the integrity of outcomes. There were no significant issues identified in FY23.

## Training and awareness

Training and awareness are key measures to address modern slavery risk at Goodman. Our Directors, Senior Management and team members are expected to be alert to possible instances of modern slavery and we provide them with updates and training to enhance their understanding. We also provide tailored education to our supply chain and procurement teams on identifying red flags and appropriate responses, including using our whistleblowing mechanisms. By empowering our people, we enhance our ability to detect and address modern slavery, demonstrating our commitment to upholding human rights.

This year, our primary emphasis was on developing tailored training for our site based team members who regularly engage with suppliers and partners. We created training packs for our regional teams to be rolled out face-to-face or virtually that covered topics such as identifying signs of modern slavery and providing guidance on appropriate actions to take if a modern slavery incident arises. The training sessions are designed to be interactive and engaging, ensuring that our people are well prepared to understand the risks and address any potential modern slavery concerns that may arise during their work.

We also delivered tailored training on sustainable and social procurement, with a specific focus on addressing modern slavery, to our offshore Shared Services Team located in the Philippines, who provide outsourced operational and administrative services and who are located in a high-risk country. The training included specific

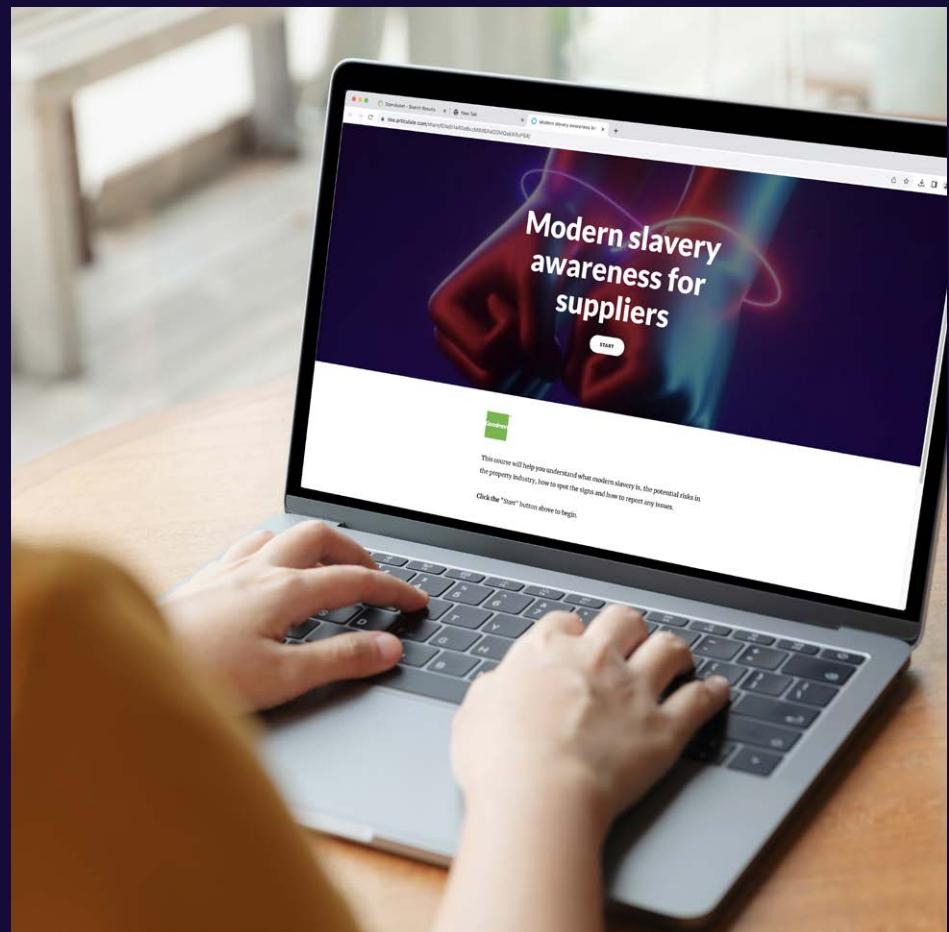


real-life cases highlighting instances of modern slavery within their own country. By providing this training, we aimed to raise awareness among our offshore team, fostering a better understanding of modern slavery and its impact, and equipping them with the knowledge to identify and address such issues within their own procurement practices.

## CASE STUDY

### Contractor sign in app in Australia now includes modern slavery training

- + In Australia, our review of the responses to our modern slavery survey identified a lack of modern slavery awareness amongst our high risk supplier categories: including developments, cleaning, and security. To address this issue and promote greater awareness, we integrated an online modern slavery training module into our contractor induction app, SinePro.
- + The modern slavery training module is available on SinePro and encompasses various important topics. These include an explanation of modern slavery and the specific risks associated with it, Goodman's approach, the signs of modern slavery, insights into the experiences of victims, and how to report any suspected issues.
- + We have made it mandatory for contractors to utilise the SinePro app each time they visit a Goodman property. When contractors sign in using the app, they are required to review the factsheet and complete the online module.
- + By incorporating this training module and factsheet within the SinePro app, we aim to enhance the awareness and understanding of our contractors and subcontractors, particularly in the development, cleaning, and security sectors.



## CASE STUDY

### Engagement with a leading UK anti-slavery charity, Unseen.

- + In the UK, Goodman engaged Unseen, a leading UK anti-slavery charity. Unseen provides safehouses and support for survivors of trafficking and modern slavery and runs the UK's Modern Slavery and Exploitation Helpline.
- + Goodman collaborated with Unseen to deliver bespoke training to our internal team as well as some of our principal suppliers. The training focused on spotting the signs an individual may present if they are being exploited, and how to feel confident in taking safe and appropriate action. The training also considered the procurement of services and possible indicators a business may be using slavery in its workforce.
- + The training looked at how the asset management teams can improve current practices and the Goodman remediation process to follow if they think there is a potential victim of modern slavery on one of our sites.
- + Positive feedback was received, and Goodman expects to continue its engagement of Unseen to examine other areas of the business.



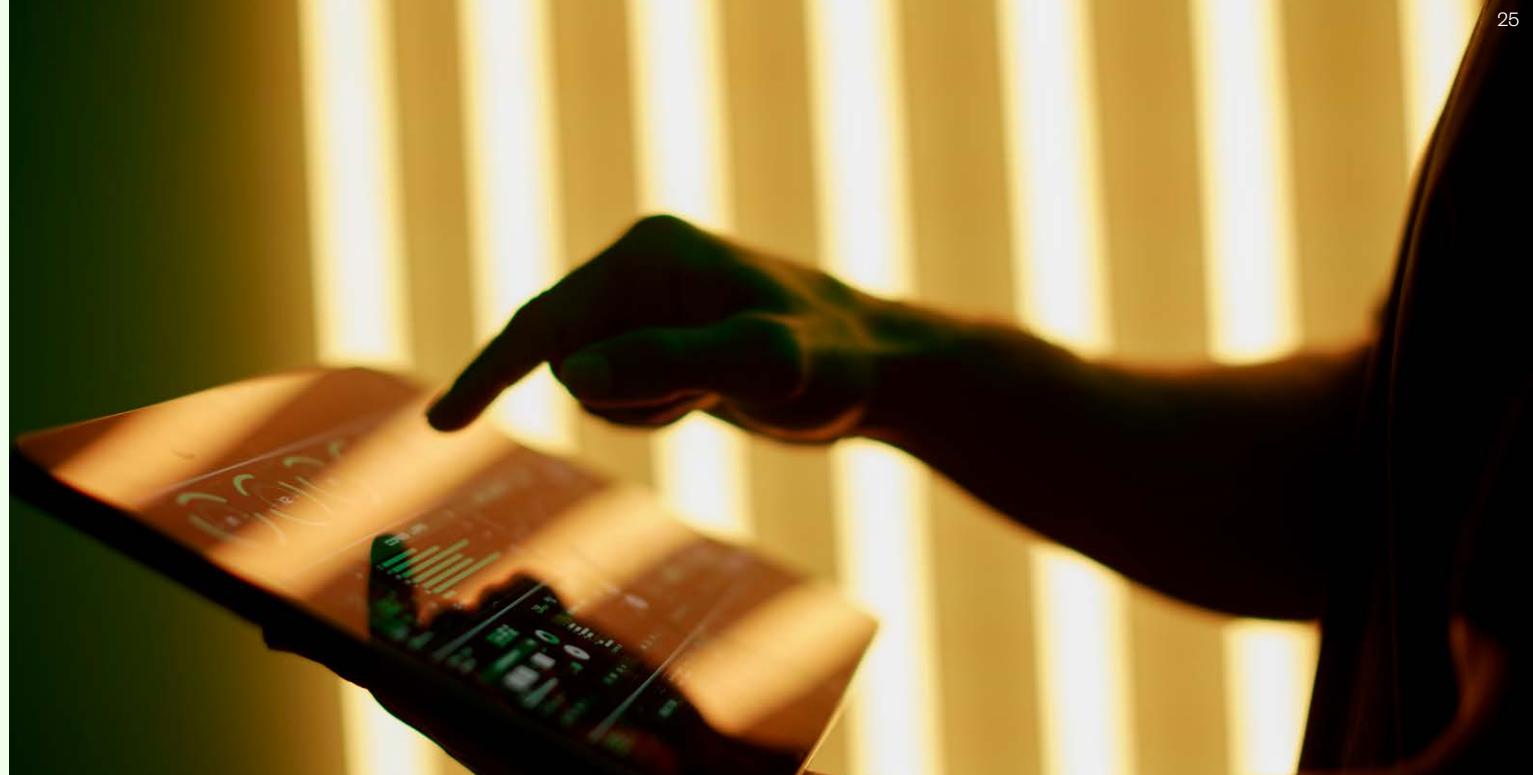
**who can  
you tell?**

If you need help or think someone could be a victim of modern slavery, call the free and confidential **Modern Slavery & Exploitation Helpline**. We're open 24 hours a day, 365 days a year.

**CALL FREE ON  
08000 121 700**

 modern slavery  
& exploitation  
**helpline**

<https://www.unseenuk.org/>



## Risk assessment and supplier mapping

### Modern slavery platform review

During the process of supplier mapping and ongoing risk assessment, we evaluated five platforms; however, none of them demonstrated capabilities to meet our global requirements. Additionally, we reviewed two consultancy firms and found that before engaging with them, it was necessary to provide a higher level of detail on Goodman's global procurement data. This will be one of our focus areas in FY24. The potential to utilise a global platform will be reviewed again in the future.

### Supplier response analysis and annual risk assessments

In FY23, regions have independently worked on their risk assessments appropriate to their risk profile such as vulnerable workforce, business model and geographic location to determine the workers more inherently likely to face modern slavery risk with a focus on understanding past supplier responses.

+ In Australia, our risk assessments in CM3 had a 90% completion rate for our property services suppliers. We also conducted a review of past supplier survey questions and their responses looking to identify any potential risks. 9.7% of our first tier suppliers are from at risk industries, with 12.4% having overseas supply chain, 19.6% employing vulnerable workforce and 3.9% utilising overseas workforce. One finding was the lack of awareness among our suppliers in high risk sectors regarding modern slavery and human rights issues within their industry. To address this gap, we have taken proactive measures by organising targeted educational workshops for our people and higher risk

general contractors specifically focused on modern slavery and human rights.

- + In Europe, the team has continued to issue their evidence-based questionnaire via EcoVadis. Europe have also assessed past responses and provided feedback to their suppliers.
- + In Brazil, supplier responses have been reviewed and physical audits have been undertaken. Annual risk assessments have also been completed, with a completion rate of 18.2% across property services and developments.
- + In China and Japan, past supplier declarations have been analysed and these declarations are now included as part of contractual negotiations.
- + In the US, past supplier survey questions and responses were reviewed. A more thorough survey was also sent to high risk suppliers as part of feedback analysis to better improve our risk profile with an overall completion rate of 25%.
- + In the UK, the team completed their annual supplier categorisation and a desktop analysis on targeted suppliers which were deemed to be at higher risk (developments, office services and real estate services).
- + In Hong Kong and New Zealand, a bespoke supplier questionnaire comprising of key questions on modern slavery was created and sent to all suppliers in high risk sectors for response. In both Hong Kong and New Zealand, the completion rate was 47%. We will be following up with suppliers in FY24 to encourage their participation and completion of the questionnaire.

## Due diligence in tendering

Goodman engages in various tendering opportunities, necessitating suppliers to undergo a prequalification process. To enhance control measures in moderate to high risk sectors, we utilise supplier self-assessment questionnaires or declarations to identify potential red flags or consider ratings from external accreditation agencies. The approach by region follows.

### Australia

In Australia, Goodman has implemented a pre-qualification modern slavery questionnaire through the platform provider CM3. We have issued this questionnaire to all asset management suppliers which includes cleaning, security and landscaping suppliers. Achieving a completion rate of 90%, we have made it a requirement for suppliers to undergo this check before onboarding as a supplier. This front end approach enables us to assess and address modern slavery risks at an early stage and ensures that suppliers are aligned with our commitment to combatting modern slavery.

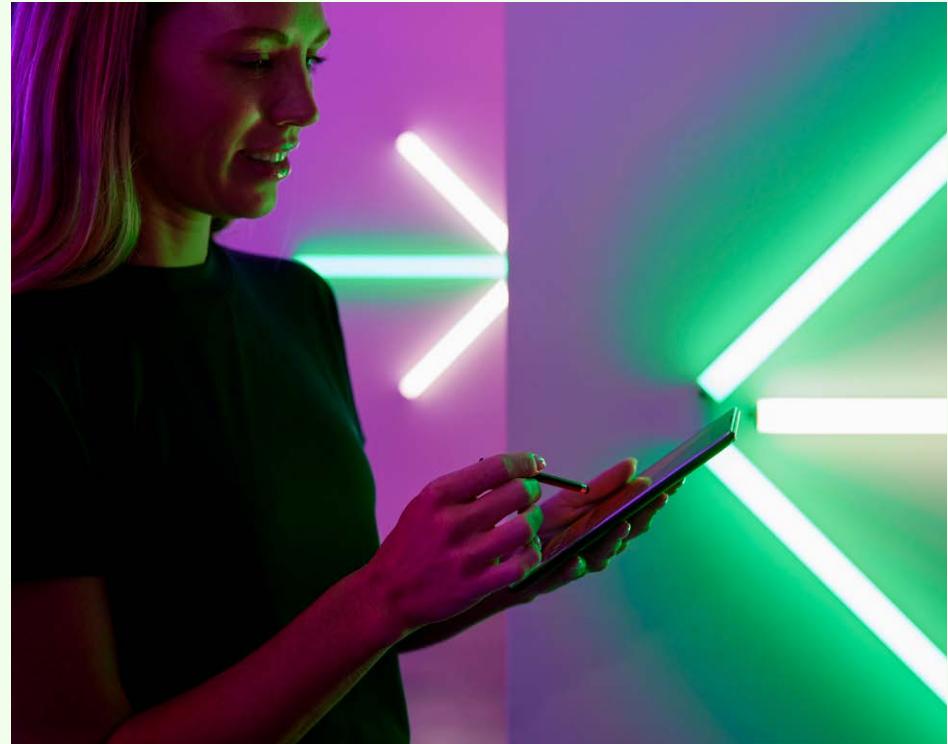
### United Kingdom

In the UK, all general contractors are required to complete a mandatory pre-qualification questionnaire that includes modern slavery due diligence questions prior to their appointment. For asset management, due diligence is outsourced and undertaken by our first tier suppliers.

### Brazil

Prior to engaging any supplier, Goodman Brazil conducts a comprehensive review of the supplier's background, compliance, and financial status in alignment with Goodman's procurement policies. For contracts over a specified threshold, suppliers must also submit their modern slavery policy as part of the bid analysis. If a supplier does not have a modern slavery policy at the time of bidding, they are required to provide a commitment to develop one during the contract's performance.

The questionnaire is renewed annually or every six months, depending on the supplier's profile with supplier response review scheduled for every six months to identify any modern slavery or human rights concerns.



### Other regions

Other regions are implementing similar due diligence mechanisms such as:

- + In Hong Kong, our tendering process for general contractors has been updated to include modern slavery due diligence at the selection stage to ensure modern slavery risks are assessed prior to contracting with a supplier.
- + In China, a modern slavery written undertaking/declaration is a part of the contractual negotiation process. All suppliers must sign this declaration in conjunction with executing their contract with Goodman.
- + In the US, a two step vendor onboarding process has been created in FY23 for property services suppliers so that all modern slavery due diligence questions are asked prior to onboarding a supplier, therefore mitigating any risks.

## CASE STUDY

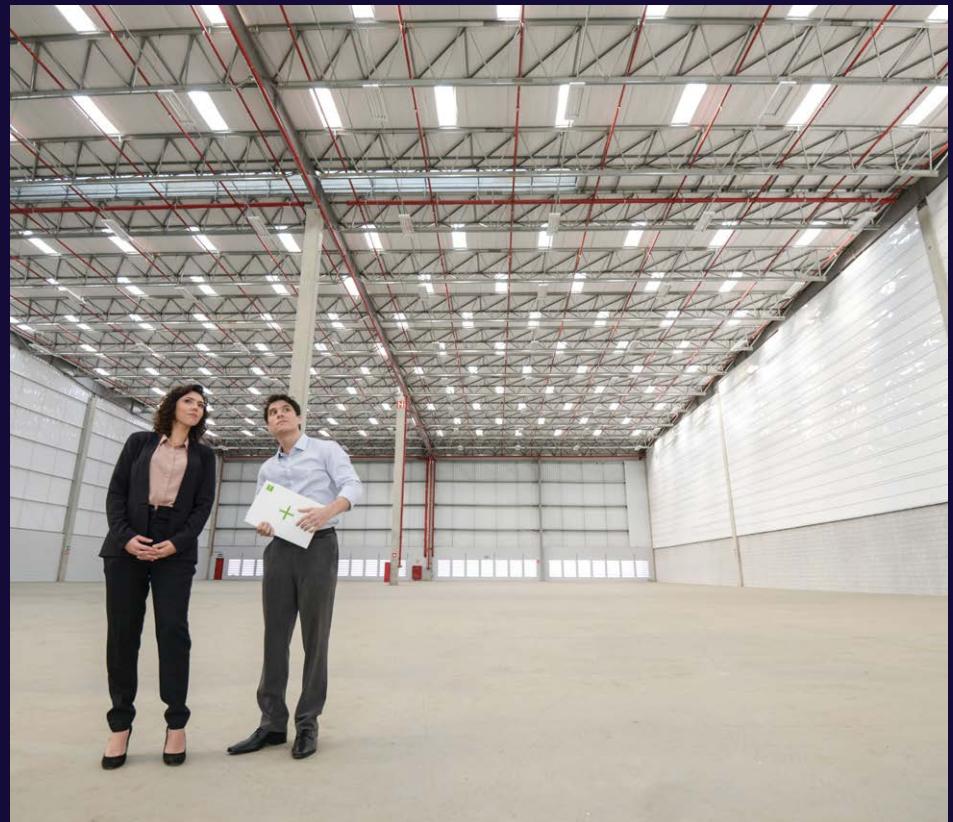
### Identifying modern slavery instances and indicators through labour condition inspections in Brazil

- + Goodman Brazil has implemented enhanced procurement processes that incorporate a specific layer of modern slavery due diligence. The following procedure has been established:
  - **Contract clauses** – all Goodman Brazil contracts include clauses that grant Goodman the right to conduct specialised labour inspections of the services provided.
  - **Inspection scope** – the inspections, which are undertaken by third-party consultants, currently HR Assessoria e Projetos, focus on assessing health and safety conditions at development sites and workforce accommodations provided by the general contractor and its subcontractors. Inspections also occur at Goodman properties, aiming to evaluate labour conditions and safety standards enforced by the service providers and their subcontractors.
  - **Visit frequency** – development site inspections take place at least monthly, without prior notice to the general contractor. The frequency may be adjusted based on the classification of the contractor's/supplier's activity risk. Inspections for stabilised properties are conducted at least once every quarter, again without prior notice to the contractors, depending on the classification of activity risk.

*No modern slavery instances or indicators have been identified as part of the reviews.*



Goodman Cajamar, São Paulo, Brazil



## CASE STUDY

### Protecting workers through a best practice workers accommodation guide in China

- + As part of our commitment to prioritise the wellbeing and safety of the workers in our supply chain, we have developed a comprehensive worker accommodation guide. This guide acts as a valuable resource for our general contractors, providing them with clear expectations and standards regarding worker accommodation on site.
- + The guide outlines the requirements for suitable and comfortable accommodation for the workers in our supply chain. It covers essential aspects such as living conditions, sanitation facilities, health and safety measures, and overall welfare considerations.
- + We are integrating this worker accommodation guide into our Tender/RFP (Request for Proposal) and general contractor contract template. By doing so, we will require our general contractors to comply with the guide as a contractual term and will assess their ability to do so before awarding a contract.



Goodman Zhongxin Jiashan High-tech Park, China

## One-on-one supplier workshops

Goodman remains committed to collaborative efforts with our supply chain to address modern slavery. By leveraging our combined influence and fostering shared learning, we strive to drive changed behaviour and make a lasting impact.

Our commitment to combatting modern slavery extends to our extensive supply chain relationships across all operating regions. When selecting general contractors for the delivery of our developments, we seek to engage with suppliers that align with our values and have a shared commitment to human rights, social responsibility, and environmental considerations.

To facilitate open dialogue and foster creative collaboration, we piloted one-on-one workshops in Australia and Hong Kong as detailed below.



## CASE STUDY

### Creating shared understanding and collaboration through supplier workshops (Australia and Hong Kong)

- + We piloted one-on-one workshops with two general contractors in Australia and six property services suppliers in Hong Kong. These workshops contributed to addressing sustainable and socially responsible procurement practices, with modern slavery being prioritised as one of the agenda items. By fostering ongoing dialogue and collaboration, we create a shared understanding of the significance of modern slavery and more broadly sustainability in procurement processes. Key learnings from these workshops were the lack of awareness of modern slavery of our suppliers and low maturity of their processes. We plan to continue these workshops in FY24 to encourage responsible supply chain practices and use our collective efforts to combat modern slavery.



Supplier workshop held in Australia

## Modern slavery factsheet – supplier capacity building

As part of our approach to addressing modern slavery, Goodman has developed a modern slavery factsheet. This concise document serves as a valuable resource that has been circulated to our regions, who are encouraged to share it with their suppliers.

The factsheet begins with a clear statement of our commitment to combatting modern slavery, emphasising our zero-tolerance approach. It then presents key facts about modern slavery, offering insights into its various forms and the industries commonly affected. The factsheet also educates readers on how to identify potential signs of modern slavery, enabling them to be vigilant and proactive in their operations.

It outlines our expectations from suppliers, emphasising the need for compliance with ethical standards and responsible sourcing practices.

The factsheet incorporates remediation guidelines, offering practical steps and measures that can be taken to address instances of modern slavery.

To seek to ensure regional relevance and effectiveness, our regions are customising the factsheet to local requirements (including translating into local languages), adapting it to reflect specific regulations and regional contexts.

The modern slavery factsheet is being utilised by each region based on local requirements including:

- + In Australia, it is being embedded in SinePro, which is used for contractor sign-ins, ensuring that suppliers are exposed to the information during their interactions with Goodman.
- + In Brazil, it is being embedded into the local version of its modern slavery standards.
- + In the US, the factsheet is embedded into the modern slavery questionnaires that are sent to suppliers.
- + In New Zealand and Hong Kong, we will work towards sharing the factsheet directly via email with suppliers, reinforcing our commitment to responsible business practices and raising awareness throughout the supply chain.

+ In other regions, we will be uploading the factsheet on our local websites, making it easily accessible to stakeholders and the public.

By disseminating the modern slavery factsheet and integrating it into our various communication channels, we aim to foster a collective understanding of modern slavery and empower our regions and suppliers to actively combat this issue.



## FICHA INFORMATIVA SOBRE A ESCRAVIDÃO MODERNA

**Compromisso de Goodman**

A Goodman reconhece que a escravidão moderna pode ocorrer em todas as indústrias e setores onde operamos, ameaçando os direitos humanos e causando dor explorar as vítimas e minar o priviléio de sua liberdade. A Goodman reconhece que a escravidão moderna é um risco global aos direitos humanos e que é uma questão de ética e responsabilidade social. A proteção dos direitos humanos é nosso pilar e cada trabalho de nossa cadeia de suprimentos é baseado no respeito ao homem e no compromisso com a segurança e a sustentabilidade.

A Goodman relata anualmente nossos esforços globais para denunciar a escravidão moderna e promover os direitos humanos e a direito humano e escravidão moderna.

Estamos comprometidos na implementação de uma série de iniciativas para erradicar a escravidão moderna em nossa cadeia de suprimentos. Com sua ajuda podemos agir juntos para reduzir ainda mais esse risco.

**Escravidão Moderna - fatos**

A escravidão moderna é uma forma grave de exploração, que pode envolver por parte de abusos dos direitos trabalhistas, isolamento e trabalho forçado, violência, chantagem, recrutamento enganoso, tráfico humano e trabalho infantil. Nos casos de escravidão moderna, a pessoa não pode recuar ou sair por causa da ameaça, violência, chantagem ou isolamento de poder.

As últimas estimativas globais indicam que 46,5 milhões de pessoas em todo o mundo vivem sob escravidão moderna e 27,6 milhões de pessoas em trabalho forçado, que pode incluir exploração em propriedades e construções. A Organização Internacional do Trabalho (OIT) estima que 100 milhões de trabalhadores em todo o mundo estão expostos ao risco para a escravidão moderna. A escravidão moderna pode ocorrer em várias partes da indústria global de produção, desde a extração de recursos naturais até os trabalhadores para realizar trabalhos que podem ser perigosos, qualificados ou de baixa remuneração e onde o recrutamento de mão de obra é frequentemente feito com fato de violência sobre os subcontratados.

**HÁ MAIS 10 MILHÕES DE PESSOAS SOB ESCRAVIDÃO MODERNA DESDE 2016**

FONTE: A Organização Internacional do Trabalho, Organização das Nações Unidas e Fundação Walk Free.

GOODMAN.COM

SETEMBRO 2023

**Como identificar a Escravidão Moderna?**

A escravidão e o tráfico humano são crimes que podem ser difíceis de detectar. As vítimas podem não procurar ajuda porque têm medo de serem descobertas ou porque seu status migratório. Sinalizações de que uma pessoa é vítima de escravidão moderna podem incluir casos em que:

- + Está sendo coagido, ameaçado ou forçado a trabalhar
- + Está sujeita a más condições de vida
- + Faz trabalho excessivo
- + Não está pagando ou recebe estar pagando por seu trabalho
- + Não possui identificação pessoal, pois seu passaporte ou outros documentos pessoais foram roubados ou sequestrados
- + Vive em condições de terceiro
- + Estas pessoas são supervisadas por pessoas que não supervisionam de um local para outro
- + Vive com medo e ansiedade, além de medo das autoridades.

**Apresentando um problema**

Esperamos que você tenha implementados os mecanismos eficazes de reclamação para que os trabalhadores possam apresentar problemas de trabalho e outras questões confidenciais, linhas diretas e-mail ou reuniões de trabalho.

Se um possível problema de escravidão moderna for detectado, ou se você identificou um problema, entre em contato com seu representante da Goodman para que possa ser tratado imediatamente:

Serviço de Proprietário  
Roberto Di Franco (11) 3709 2550

Desenvolvimento:  
Márcio Kamiyama (11) 3709 2550

Você também pode enviar um e-mail para:  
[escravidao@goodman.com](mailto:escravidao@goodman.com)

Em caso de emergência, quando houver perigo imediato para uma vítima de escravidão moderna, ligue para a polícia no número 190.

**Expectativas do fornecedor**

A Goodman procura desenvolver parcerias com nossos fornecedores que atuam de acordo com os valores e princípios fundamentais de direitos humanos, ambientais, regulatórios, sociais e de direitos humanos. Esperamos que nossos fornecedores:

- + Respeitam os direitos humanos e adotar as medidas cabíveis para identificação e prevenção de riscos para a escravidão moderna e suas operações e cadeias de suprimentos
- + Tornar todas as medidas cabíveis para tratar de quaisquer problemas de escravidão moderna em suas operações de fornecimento e trabalhar com a Goodman para reparar danos que possam resultar de escravidão moderna
- + Adotar procedimentos para garantir que os fornecedores eticos e que cumprem toda a legislação pertinente e buscam evitar o risco de escravidão moderna em suas operações.

Você pode encontrar mais informações sobre as nossas expectativas sobre nossos fornecedores em nossa [Declaração de Fornecedores](#).

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Brazil factsheet



## Modern slavery signage – supplier and worker awareness building

In 2023, Goodman has been installing signs on our development sites in Brazil, China and the US. Signs are also being installed on our established properties in Brazil. The purpose of these signs is to ensure high visibility by targeting workers on site, including subcontractors, and provide them with important information about modern slavery and labour law compliance issues as well as our grievance mechanism.

The signs and posters have been created in local languages to ensure that the information is accessible to workers.

These signs enable us to communicate directly with onsite labourers. It serves as a proactive measure to educate and inform them about their rights, potential risks, and available channels for reporting any concerns or grievances they may have.

The signs provide guidance on how to report concerns to us. The inclusion of a grievance mechanism channel is to create a safe and transparent environment for workers to voice their concerns (if needed anonymously).



**嘉民,一个合规且有道德的商业伙伴**

嘉民承诺在我们的运营和供应链中,严格恪守商业道德并遵守相应的法律。嘉民强烈支持在供应链中遵守劳动法,促进所有工人获得公平公正的待遇。嘉民不容忍其在全球供应链中出现的不遵守劳动法的不合规情况,坚信所有工人都有权获得相应的报酬和安全的工作环境。如果你发现嘉民的供应商、代理商或第三方存在不道德,不合法或不正当的行为,我们鼓励你上报这些问题,以便得到妥善处理。

### 如何报告忧虑

我们鼓励供应商,代理商和第三方向嘉民报告以下任何情况:

- ① 不诚实、欺诈、腐败、非法或不道德的行为
- ② 任何不安全的行为或不遵守劳动法,包括:
  - 低于最低法定年龄的工人
  - 工人未得到符合劳动法规定的公平待遇或报酬
  - 工人工作时长超过劳动法规定的最大工时数
  - 工人不能根据适用的劳动法终止雇佣关系而被迫工作的情况

**联系方式:**

电子邮箱: [ethicalconcerns@goodman.com](mailto:ethicalconcerns@goodman.com)  
 网 站: 您也可以通过网站上‘联系我们’提出您的关切, 网站地址:[www.goodman.com](http://www.goodman.com)

**Goodman**

Signage in China



## External Partnerships

Goodman acknowledges that partnerships are key to effective change. Modern Slavery can only be ended by working with others and Goodman seeks out partnerships where we can drive strategic initiatives, leverage collective action and gain valuable insights from others.

One such partnership is our involvement in key industry working groups, including the Property Council of Australia (PCA) National Sustainability Roundtable, National Social Sustainability Roundtable, and the PCA Modern Slavery Working Group. By collaborating with other prominent property companies in Australia through the PCA Working Group, we aim to comprehensively understand and address modern slavery risks associated with the property and construction sectors. The group's primary objective is to collectively identify opportunities for strengthening controls and adopting best practices across the industry.

The PCA Working Group is recognised as a prime example of “good practice” in the recently released fourth and final publication of a collaborative research project involving nine academic and civil society organisations who provided guidance to businesses on essential aspects of human rights due diligence and strengthening their responses to Australia’s Modern Slavery Act. The Good Practice Toolkit draws on the project’s findings, showcasing how companies are implementing the Act and conducting human rights due diligence.

During the year we also provided feedback to the PCA Working Group on the operation of the Australian legislation and the KPMG “Guide to Modern Slavery Remediation”.

We are exploring similar partnerships in our other regions.

## Remediation process

As part of our modern slavery program, we have documented the process to be undertaken if an instance of modern slavery in our operations or supply chain was identified.

Our remedy pathway is detailed below:



Within our remediation pathway, we have outlined a comprehensive approach to address grievances and whistleblowing. The pathway details the available channels for reporting concerns, ensuring individuals have clear avenues to raise issues. It also provides step-by-step guidance on how to handle reported concerns, involving various internal teams to address the matter effectively.

Our remediation pathway is designed to address grievances promptly, provide support to victims, and work towards preventing similar incidents in the future.

Remedial actions may vary depending on the specific incident and determined on a case-by-case basis and can include:

### ACCESS TO FACILITIES

- + Legal advice
- + Medical services
- + Counselling
- + Temporary accommodation.

### FINANCIAL ASSISTANCE

- + Payment of owed wages
- + Refund of recruitment fees
- + Refund of visa costs
- + Transportation or repatriation costs.

### OTHER ACTIONS

- + Providing an apology to workers
- + Determine what can be done to prevent it from happening in the future.

Our regions are in the process of implementing localised grievance mechanisms and remedy pathways.

## Assessing the effectiveness of our actions

In FY23, Goodman reviewed its Key Performance Indicators (KPIs) across our four key performance areas. These key metrics assess the effectiveness of our actions to identify and address modern slavery practices in our operations and supply chain. Our modern slavery working group continuously reviews and assesses the effectiveness of our processes to address potential modern slavery risks and reports our progress to the Audit, Risk and Compliance Committee and Goodman Group Boards.

Goodman has reviewed our FY23 progress against our KPIs in each key performance area as detailed below:

OUR ACTIONS			
KEY PERFORMANCE AREA	ACTION	MEASUREMENT	
WHAT ARE WE ASSESSING?	WHAT ARE WE DOING?	OUR KEY PERFORMANCE INDICATORS	FY23 ASSESSMENT
<b>Governance and risk management</b>  Supply chain mapping and identifying high risk suppliers in our global operations and supply chains.	<ul style="list-style-type: none"> <li>+ Goodman Group Boards and Audit, Risk and Compliance Committee oversight of modern slavery policies and processes</li> <li>+ Policy review</li> <li>+ Streamline approach and processes across the Group including supplier onboarding</li> <li>+ External collaboration on key risks</li> </ul>	<ul style="list-style-type: none"> <li>+ Provide updates to the Audit, Risk and Compliance Committee at least quarterly on modern slavery initiatives</li> <li>+ Biennial review of key policies to ensure that modern slavery is properly considered</li> <li>+ Maturity assessments or audit of processes conducted including supplier onboarding</li> <li>+ Consider the risks identified in our strategy to address modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>+ Achieved – updates were provided to the Audit, Risk and Compliance Committee quarterly during FY23</li> <li>+ Achieved – Goodman's suite of corporate governance policies were reviewed and updated during FY23 with reference to modern slavery adequately dealt with</li> <li>+ In progress – ongoing review of potential tools and platforms to better understand our modern slavery maturity and identify any enhancements to our modern slavery approach. This review will be used to develop our modern slavery long term roadmap including consistent supplier onboarding approaches</li> <li>+ In progress – our detailed risk-based mapping will be further analysed to further our understanding of where modern slavery risks are most prevalent in our supply chain including further down our supply chain.</li> </ul>

## OUR ACTIONS

KEY PERFORMANCE AREA WHAT ARE WE ASSESSING?	ACTION WHAT ARE WE DOING?	MEASUREMENT OUR KEY PERFORMANCE INDICATORS	FY23 ASSESSMENT
<p><b>Due diligence and engagement</b></p> <p>Due diligence – policies, contracts and monitoring with supplier questionnaires, declarations, deep dives, audits or site visits</p> <p>Engagement – process to engage with suppliers and workers regularly and transparently</p>	<ul style="list-style-type: none"> <li>+ Supplier self-assessment questionnaire, declaration or review (including desktop, interview or deep dive)</li> <li>+ Review of supplier responses</li> <li>+ Contracts with modern slavery provisions</li> <li>+ Developing Request for Proposal content to include modern slavery elements.</li> </ul>	<ul style="list-style-type: none"> <li>+ Seek to improve the completion rate of questionnaires or declarations year on year</li> <li>+ Seek to enhance supplier understanding and awareness</li> <li>+ Review the responses provided by suppliers and identify those that require further due diligence</li> <li>+ Conduct reviews of higher risk suppliers (including desktop, interview, deep dive or site visits)</li> <li>+ Goodman precedent documents reviewed for modern slavery or responsible sourcing commitments.</li> </ul>	<ul style="list-style-type: none"> <li>+ Achieved – all regions have followed up completions of supplier questionnaires or declarations in FY23 with continued improvement in the completion rate of surveys and questionnaires</li> <li>+ In progress – our continued focus going forward is enhancing supplier understanding through training, supplier workshops and our factsheet</li> <li>+ In progress – review of past supplier questionnaires and responses to better understand risks and next steps. We commenced on site reviews in Brazil and will develop improvement plans for our suppliers in high risk sectors in FY24</li> <li>+ In progress – ongoing supplier conversations such as supplier deep dives and increasing physical presence at the supplier level where possible</li> <li>+ In progress – ongoing implementation of the Modern Slavery Operational and Supplier Standards to provide guidance as to red flags and further due diligence requirements, in response to our KPI to enhance supplier understanding.</li> </ul>

## OUR ACTIONS

KEY PERFORMANCE AREA WHAT ARE WE ASSESSING?	ACTION WHAT ARE WE DOING?	MEASUREMENT OUR KEY PERFORMANCE INDICATORS	FY23 ASSESSMENT
<b>Training and awareness</b>  Increasing awareness and understanding of modern and human rights risks for our people	+ Team member and supplier training on modern slavery and associated risks.	+ 90% of relevant global team members trained  + Seek feedback from our people on the training provided and increase in awareness of modern slavery issues after training  + Supplier training and awareness	+ Achieved – over 90% of Goodman team members received modern slavery training in FY22 (including the Goodman Group Boards) and over 90% of our people completed the Compliance refresher training in FY23 which included a scenario on modern slavery. Other regional training provided included the Unseen UK session for the internal and external asset management teams.  + Achieved – tailored training to our site based team members who regularly engage with suppliers.  + Achieved – training to our offshore team in Philippines and online module in Australia for contractors that attend sites.
<b>Grievance mechanisms and reporting</b>  Promoting grievance mechanisms, providing remedy and taking corrective actions	+ Review of channels and mechanisms for grievances to be raised  + Modern slavery issues identified and remedied	+ Continue to monitor complaints received via reporting channels relating to modern slavery instances or suspected cases	+ Achieved – no issues relating to human rights or modern slavery were received in the year. We reviewed our grievance mechanisms during the year and identified ways to enhance them, so they were more accessible by enabling concerns to be raised via our local websites and promoted through virtual and/or face-to-face training, posters and signages at our sites, (in local languages) and contractor sign-in processes etc.

Goodman acknowledges that tackling modern slavery requires an ongoing commitment, effective engagement with our suppliers and collaboration with both the industry and NGOs. Goodman recognises that those at the top of the supply chain can assist in creating conditions that encourage lower tier suppliers to adopt good practice.

This year we have reviewed and enhanced our metrics to assess and further improve the effectiveness of our actions. The objective for Goodman is for these revised actions and reporting metrics to become business as usual activities. Refer to "Looking forward" for our revised actions and metrics that we will assess ourselves against in 2024.

## Process of consultation

### Engagement with other Goodman entities

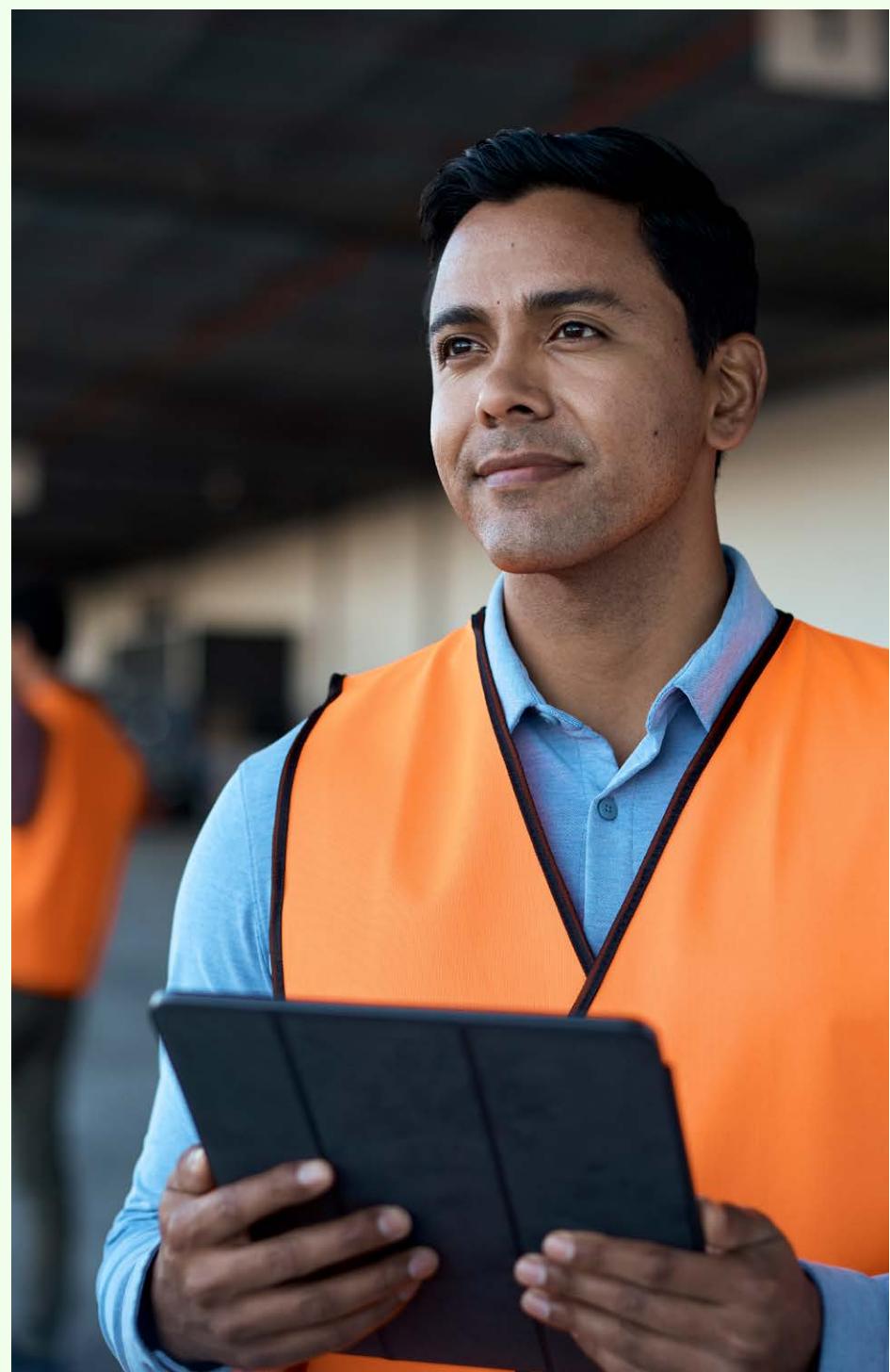
This Statement was developed by our modern slavery working group with review and input from a number of teams globally including procurement, legal, compliance, risk, sustainability, property services, developments and human resources. The input and review process incorporated the insights and expertise of each team which included team members with global responsibility.

In the process of preparing this Statement, the modern slavery working group actively engaged and consulted with all operating regions, which are responsible for, and represented, all reporting entities and companies we each own or control. This inclusive approach ensured that the unique perspectives and experiences of each region were taken into account. Regular collaboration workshops were held with the modern slavery working group in each region with high levels of engagement to discuss their approach to managing risks and share best practice outcomes and expertise across due diligence analysis and remediation. Over 30 formal workshops were held during the year with additional ad hoc meetings with the regional teams to consider key areas of risk mitigation.

The active involvement and contribution of the regions were vital in creating a comprehensive and well-informed approach to addressing modern slavery risks. By considering the perspectives and experiences of the regions, the working group was able to develop strategies and best

practices that were relevant and effective across the entire organisation. The modern slavery working group also briefed the Executive Steering Group during the year who contributed to Goodman's ongoing strategy and approach.

Goodman's Executive Steering Committee, Audit, Risk and Compliance Committee and all Goodman Group Boards reviewed this Statement and provided feedback on its content.



## Looking forward – our plans for 2024

Goodman is committed to identifying and remediating modern slavery risks. We are committed to the below actions in the year ahead noting that initiatives will vary in each region dependent on risk and the modern slavery program maturity.

### OUR REVISED ACTIONS

GOALS	ACTION	KPI
Confirm that our key policies and contracts are responsive to the risks we have identified and are being implemented	<ul style="list-style-type: none"> <li>+ Review our key policies and contracts with the aim of confirming they align with best practices and effectively address the modern slavery risks that we have identified.</li> <li>+ Assess whether our procurement processes globally (including RFP, contracting, supplier onboarding and pre-qualifications) are effectively identifying and taking into consideration modern slavery risk.</li> </ul>	<ul style="list-style-type: none"> <li>+ All key policies and precedent agreements or contracts reviewed and updated where appropriate.</li> <li>+ Undertake checks to evaluate compliance against key policies and procedures.</li> </ul>
Enhance our understanding of our supply chain risk and develop action plans where needed	<ul style="list-style-type: none"> <li>+ Continue risk mapping across our global supply chain.</li> <li>+ Continue yearly assessments, surveys and/or declarations across all regions.</li> <li>+ Continue supplier response reviews in high risk categories across various regional assessment processes.</li> </ul>	<ul style="list-style-type: none"> <li>+ Review procurement data across suppliers in high risk sectors for better visibility and risk mapping.</li> <li>+ Finalise review of supplier due diligence questionnaires or declarations completed to date or during the year.</li> <li>+ Each region's due diligence process (assessments, surveys, declarations, written undertakings) to be completed for suppliers in high risk sectors.</li> <li>+ Meet with at least 10 current suppliers from high risk sectors, to discuss their modern slavery strategy and remediation framework.</li> <li>+ Develop an action plan for high risk suppliers where appropriate.</li> </ul>
External capacity building – educate suppliers	<ul style="list-style-type: none"> <li>+ Provide training and raising the awareness of our suppliers through factsheets, posters, online training, and one-on-one workshops.</li> </ul>	<ul style="list-style-type: none"> <li>+ Create regional versions of the factsheet and make available to high risk suppliers.</li> <li>+ Run online localised supplier training sessions targeting high risk suppliers that lack awareness and maturity.</li> </ul>

## OUR REVISED ACTIONS

GOALS	ACTION	KPI
Engage with workers on our sites to understand their experience, if any, of modern slavery	<ul style="list-style-type: none"> <li>+ Educate workers in relation to their rights and seek to understand any modern slavery or human rights impacts that they experience.</li> <li>+ Raise awareness of our grievance mechanism for our site based workers in identified high risk projects or properties.</li> </ul>	<ul style="list-style-type: none"> <li>+ Install signs at our high risk project sites (in local languages) in relation to modern slavery and labour law compliance issues and how to raise a concern.</li> <li>+ Investigate all concerns raised in relation to modern slavery via our grievance mechanism.</li> <li>+ Make available to our suppliers online training for site based workers across regions.</li> </ul>
Mature our understanding of modern slavery risk beyond our first tier suppliers	<ul style="list-style-type: none"> <li>+ Develop a plan to prioritise our review of suppliers beyond our first tier.</li> <li>+ Explore the opportunity to work with the Cleaning Accountability Framework.</li> </ul>	<ul style="list-style-type: none"> <li>+ To be finalised and submitted to our modern slavery working group.</li> <li>+ Pick one high risk category of second tier supplier to be a pilot for engagement.</li> </ul>
Test our remediation process	<ul style="list-style-type: none"> <li>+ We will conduct a mock scenario to test the effectiveness of our remedy pathway.</li> <li>+ We aim identify any gaps or areas that need improvement.</li> </ul>	<ul style="list-style-type: none"> <li>+ One test to be undertaken during the reporting year.</li> </ul>
Internal capacity building – improve internal understanding of modern slavery and our framework within the Group	<ul style="list-style-type: none"> <li>+ Run targeted training for site based team members who directly engage with suppliers to enhance their awareness.</li> <li>+ Undertake ongoing Board training including in relation to remediation.</li> </ul>	<ul style="list-style-type: none"> <li>+ Training sessions for site based team members on high risk projects or those who directly procure from high risk sectors and attendance to include at least 70%.</li> <li>+ Provide one Board training session in relation to modern slavery for Goodman Group Boards.</li> </ul>
Continue industry collaboration	<ul style="list-style-type: none"> <li>+ Participate in Property Council of Australia modern slavery group.</li> <li>+ Identify similar groups in other regions.</li> </ul>	<ul style="list-style-type: none"> <li>+ Attendance at each meeting during the year.</li> <li>+ Research relevant industry groups per region.</li> <li>+ Hold one session with an NGO or similar organisation.</li> </ul>

## CORPORATE DIRECTORY

### Goodman Group

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ABN 69 000 123 071

#### Goodman Industrial Trust

ARSN 091 213 839

#### Goodman Funds Management Limited

Responsible Entity of Goodman Industrial Trust

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AFSL Number 223621

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Brussels	Pennsylvania
Chongqing	San Francisco
Düsseldorf	São Paulo
Guangzhou	Shanghai
Hamburg	Shenzhen
Hong Kong	Tokyo
London	
Los Angeles	
Luxembourg	
Madrid	

#### ASX code

GMG

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