Goodman

JOINT MODERN SLAVERY STATEMENT 2022

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

Modern slavery is a serious form of exploitation present in global supply chains, that can take place through labour rights abuses including forced labour, debt bondage and child labour. It can come about through the use of coercion, threats or deception to exploit or deprive people of their freedoms, rights and access to safe and fairly compensated employment.

It spans industries, but an estimated 18% of all modern slavery victims are found in the property and construction industry. Additionally, 22% of all forced labour victims are found in the manufacture and production of raw materials – key suppliers to the property and construction industry. Goodman is not immune to the risk of modern slavery. The risk of modern slavery is most likely to be present within our supply chain which includes over 8000 suppliers (as opposed to our direct employees where we have strong controls in place).

Our Sustainable Sourcing Framework and our robust, risk-based approach to modern slavery enable us to respond better to these risks and work with suppliers and other stakeholders to mitigate them. We have also committed to developing and implementing global operational and supplier standards and guidance on modern slavery to assist our teams involved in procurement in FY23. Together, these actions represent a strong signal about business ethics that will spread along our operations and through our supply chain.

This Statement has been approved by the Goodman Group Boards on behalf of the reporting entities covered by this Statement on 29 September 2022.

Target 8.7
End modern slavery, trafficking and child labour

SUSTAINABLE DEVELOPMENT GOALS

Greg Goodman
Group Chief Executive Officer
29 September 2022

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At Goodman, we acknowledge the traditional custodians of the land on which we operate and acknowledge our gratitude to the people of the lands of our First Nations people with whom we share this land. We understand the cost of that sharing, and we hope and believe that we can move to a place of equity, justice, and partnership together.

OUR 2022 HIGHLIGHTS

Key program controls:

Risk assessment

Training and awareness

Due diligence

Engagement

Remediation

In 2022, we focused on supply chain ethics and undertook the following measures:

1. We continued to embed our human rights and modern slavery commitments globally. Each region has now implemented actions in the key areas of our program controls including risk assessment, training and awareness, due diligence, engagement and remediation.

2. We developed a Sustainable Sourcing Framework which is designed to protect human rights and prevent modern slavery and labour exploitation. We will implement our responsible sourcing practices in FY23 and reward suppliers that support social factors such as fair and appropriate working conditions and workers' rights.

3. To support our Sustainable Sourcing Framework we commenced the development of global operational and supplier standards and guidance in relation to human rights, modern slavery and labour protection for our Procurement teams.

4. We continued to engage trusted and strategic supply partners, and develop partnerships with suppliers that operate with aligned values and standards as detailed in our global Statement of Business Ethics (Supplier Code of Conduct). This was updated during the year and incorporated into our procurement contracts. Supplier engagement will remain a key focus for FY23.

5. We developed a comprehensive bespoke modern slavery training module to give our people an understanding of modern slavery, the risks in the property industry and what to look out for. Over 90% of our people globally have completed modern slavery training.

6. Given our ongoing commitment to human rights and modern slavery, we recruited a new resource in the Procurement team to focus on responsible sourcing, ethical issues and addressing risks in our supply chain.

27.6M people in forced labour

54% 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

About our Statement and reporting entities

This is Goodman's Modern Slavery Statement (Statement) for the financial year 1 July 2021 – 30 June 2022 (FY22) 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 constitutes Goodman Group's joint Modern Slavery Statement.

Goodman Group (Goodman or Group), is a triple stapled entity comprising the Australian company, Goodman Limited, the Australian trust, Goodman Industrial Trust and the Hong Kong company, Goodman Logistics (HK) Limited. Their stapled securities are listed and traded on the Australian Securities Exchange under the code GMG. The Boards of GL and Goodman Funds Management Limited, as the responsible entity of GIT, comprise the same directors while GLHK has a distinct Board with some overlap (together they are referred to as the Goodman Group Boards).

This Statement has been prepared for Goodman and the respective entities over which Goodman had control for accounting purposes during the financial year ended 30 June 2022. Goodman also submits this joint Statement on behalf of Goodman UK Holdings Limited.

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

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 chains and to maintain responsible and transparent supply chains. 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.

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 UK Holdings Limited (GUKH)	Mandatory reporting entity in the UK

Our structure, operations and supply chains

Structure

Goodman comprises Goodman Limited, Goodman Industrial Trust and Goodman Logistics (HK) Limited and their respective subsidiaries which contributed to its total annual consolidated revenue as at 30 June 2022. Refer to the Goodman Group Annual Report 2022 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 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 Goodman Group Boards oversee and regularly review our corporate governance framework to address our obligations as a responsible corporate entity. Refer to Goodman's Corporate Governance Statement 2022.

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 on the next page.

GOVERNANCE STRUCTURE

Goodman Group Boards

Provides strategic direction and oversees the effective management and performance of Goodman. Holds the ultimate responsibility for overseeing Goodman's Sustainability Strategy and approving our Modern Slavery Statement.

Board Committee: Risk and Compliance Committee

Responsible for overseeing the implementation and effectiveness of Goodman's Risk, Compliance, Safety and Sustainability frameworks. Has delegated authority from the Goodman Group Boards to assist in the oversight of Risk, Compliance and ESG 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, 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 Director, Group Chief Financial Officer, Chief Risk Officer and Group Head of Legal and Company Secretary. Progress against our modern slavery strategy is regularly reported to the Group CEO, Management Committees and Risk and Compliance Committee. This working group meets regularly to drive the continuous improvement in Goodman's approach to tackling modern slavery risk.

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

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.

We have 410 properties located in key consumer markets in 14 countries across the Asia Pacific, Europe and the Americas. With over AUD$73 billion of assets under management at 30 June 2022, we are the largest property group listed on the Australian Securities Exchange and invest significantly alongside our capital partners in our Investment Partnerships.

But we're more than our properties. We're a collaborative team who work together to make a tangible difference for our customers, our people and the communities we operate in. Our people are our greatest asset with a value set that promotes innovation, determination, integrity and sustainability – and we strive to make space for greatness in everything we do.

We employ more than 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 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.

Goodman works closely with all our customers, our team members, third party suppliers and investment and community partners.

Additional information about Goodman can be found on our website at www.goodman.com.

1000+ PEOPLE WORLDWIDE

44% FEMALE

56% MALE

WORKFORCE PER SEGMENT

10% THE AMERICAS

25% EUROPE / UK

26% ASIA

39% AUS /NZ

1,700+ CUSTOMERS GLOBALLY

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 NETWORK

$73.0BN

TOTAL AUM

410

PROPERTIES

THE AMERICAS

$8.5BN
AUM

28
PROPERTIES

- ALLENTOWN
- LOS ANGELES
- NEW JERSEY
- SAN FRANCISCO
- SÃO PAULO

EUROPE/UK

$11.9BN
AUM

132
PROPERTIES

- AMSTERDAM
- BIRMINGHAM
- BRUSSELS
- DÜSSELDORF
- HAMBURG
- LONDON
- LUXEMBOURG
- MADRID
- MILAN
- MUNICH
- PARIS

ASIA

$22.8BN
AUM

71
PROPERTIES

- BEIJING
- CHENGDU
- CHONGQING
- GUANGZHOU
- HONG KONG SAR
- OSAKA
- SHANGHAI
- SHENZHEN
- TOKYO

AUS/NZ

$29.8BN
AUM

179
PROPERTIES

- AUCKLAND
- BRISBANE
- MELBOURNE
- SYDNEY

* As at 30 June 2022. All figures in Australian dollars.

Our supply chain

Our supply chain consists of small, medium, and large-scale suppliers with whom we partner 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 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$4.5 billion across three key areas of our business:

SUPPLY CHAIN

ASSET MANAGEMENT

The repair and maintenance of our 410 properties. Suppliers include cleaning, security services, waste management, heating, ventilation and air conditioning services (HVAC), fire safety, plumbing, landscaping and repair and maintenance.

DEVELOPMENT

Development of new properties and re-development of existing properties with work-in-progress of AUD$13.6 billion*. 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 always appoint General Contractors for the construction of our developments. Suppliers include General Contractors[1] and the parties with whom they contract such as specialist subcontractors for the supply of raw materials used in construction and for construction labour.

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.

* As at 30 June 2022

1 The definition of "General Contractor" is a person or business entity that contracts to be in charge of a building project which usually involves the use of subcontractors.

GOODMAN SUPPLY CHAIN AND SUPPLIER SPEND

APPROX. $4.5 BILLION GLOBAL SPEND

8,173 Suppliers
$859M Asset Management
$2.9B Developments
$755M Corporate

* As at 30 June 2022. All figures in Australian dollars.

We report our suppliers by financial reporting segments in accordance with our financial report.

By volume of individual transactions, asset management has the highest number of separate engagements in our supply chain.

Design and construction of our developments are outsourced and by value are the most significant area of our supply chain at approximately 64% of expenditure. Goodman manages this risk by engaging strategic and trusted supply partners with whom we engage on multiple projects globally.

TOTAL SPEND IN AUD BY DEVELOPMENT

Modern slavery risks in our operations and supply chain

Goodman recognises that modern slavery can occur in every industry and sector. The International Labour Organisation has identified property and construction as high risk sectors for modern slavery.

Modern slavery is prevalent in the property and construction industry as it relies on workers to carry out jobs that can be hazardous, base-skilled or low paying. Often labour recruitment is outsourced with lack of visibility over the employment practices of suppliers and subcontractors. There can also be multi-tiered supply chains operating in high risk geographies with forced, bonded or child labour.

Why is property and construction high risk?

- HIGH DEMAND FOR LOW-SKILLED LABOUR FORCE
- POOR VISIBILITY OVER LONG AND COMPLEX SUPPLY CHAINS
- LOW-TIER SUPPLIERS OPERATING IN HIGH RISK GEOGRAPHIES

Common modern slavery practices in property and construction

- FORCED OR UNPAID WORK
- UNSAFE CONDITIONS
- BONDED AND CHILD LABOUR
- INADEQUATE ACCOMMODATION
- PASSPORT CONFISCATION
- HUMAN TRAFFICKING

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

Responding effectively to our modern slavery risks requires us to understand the types of exploitative labour practices and breaches of human rights that enable modern slavery situations to occur. This in turn helps us prioritise the greatest risks to people.

Goodman's risk methodology

Goodman's risk assessment of modern slavery in our global operations and supply chains considers the risk that we are causing, contributing to, or directly linked to modern slavery through our operations and supply chains in accordance with the UN Guiding Principles on Business and Human Rights. Our concept of "risk" when referring to modern slavery is where there may be people experiencing or exposed to modern slavery.

The purpose of our risk assessment approach was to identify the key risks to focus our efforts where there is the greatest impact to people. We considered modern slavery risks for workers in the context of labour conditions of our direct workforce and labour conditions of indirect labour used in our supply chains. It was also formulated having regard to modern slavery data and resources published by non-government organisations (NGOs) and international organisations such as the International Labour Organisation and the Walk Free Foundation.

Operations (direct workforce)

In FY22, we confirmed that the likelihood of modern slavery risk eventuating in our operations and direct workforce is low, and mitigated by a number of controls. In considering the risk, we assessed this in the context of elements of all forms of modern slavery as well as consideration of our people's health and safety, ethical conduct, and equality.

The majority of Goodman's people are employed directly on permanent contracts and are skilled professionals. We have verified that our team members are paid in accordance with applicable industrial relations laws; and all our permanent employees, both full-time and part-time, regardless of position participate in short term and long term incentives. Goodman makes the health and wellbeing of our people a priority including offering wellbeing programs and flexible working models.

Supply chain

In FY22, we also confirmed the risks of modern slavery in our supply chains having regard to the Global Slavery Index 2018: Walk Free Foundation to determine our risk-based approach to high risk countries and sectors.

As noted, the property industry is at high risk for modern slavery practices where there is high demand for base-skilled workers who are vulnerable to exploitative practices including for security, maintenance, cleaning services and construction labour. Raw materials such as bricks, cement, and manufactured products are often sourced from higher risk geographies that may be associated with poor working conditions, forced labour and child labour. Business models are also often based on outsourcing, which increases the complexity of operations and supply chains and decreases the visibility of labour risks and impacts. The procurement of company merchandise is another potential risk factor with products being sourced from higher risk geographies.

In developing our risk-based response, Goodman considered the UN Guiding Principles and applied risk metrics to identify the greatest risks to people, our level of influence, supplier spend and the ability to remediate any potential issues. Our regions have also developed their own supply chain maps scrutinising localised geographic and industry-based considerations for the region in which they operate such as vulnerable populations, high risk categories of supply and high risk labour supply. The assessment divided our spend into procurement categories which were then screened for risk factors including labour rights, decent work conditions, health and safety, human rights and governance. Our human rights and modern slavery risk metrics enable us to focus on high risk suppliers.

Focusing on high risk suppliers

As described in our risk assessment, certain suppliers represent a higher risk for modern slavery. In FY22, we engaged 449 high risk suppliers globally representing AUD$1.9 billion in supplier spend in the categories of cleaning, security, landscaping and construction.

These suppliers will be a key focus going forward. Goodman aims to build stronger relationships with our strategic suppliers through consolidation of our supply chain to improve alignment and practices, increase visibility and reduce the complexity of our supply chains.

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

Vulnerable populations	High risk geographies	High risk business models	High risk product and service categories
Reliance on vulnerable populations **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.	Higher risk geographies where there is lack of regulation or enforcement, lower human rights standards or prevalence of corruption and criminal organisations. **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).	Business models structured around high risk practices such as the use of outsourcing, sub contracting 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. **Examples:** subcontracting for cleaning, security, maintenance and third party construction labour.	Raw materials for property and construction with dangerous and insecure working conditions. **Examples:** raw materials (bricks, steel and concrete) for property and construction.

Source: https://home.kpmg/au/en/home/insights/2020/08/property-construction-modern-slavery-practical-guide.htm

Applying the identified attributes and relating it to our three operational areas we determined the following workers to be more likely to face modern slavery risk:

	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 geographies, 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.
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 jurisdictions, there are risks in relation to base-skilled, casual and migrant labour for asset management.
Operational and corporate	+ Suppliers using base-skilled workers.	+ Low profit margin.	+ Production and sourcing of marketing merchandise, office-related products and IT equipment from higher risk geographies and those with weaker labour laws.

In each country we operate in, the supply chains below our tier 1 suppliers (with whom we directly contract with) including our tier 2 and tier 3 suppliers and beyond, will involve both domestic and imported elements adding complexity and difficulty in mapping and monitoring supply chains. It is this extended supply chain that has been also identified as a risk for modern slavery.

We acknowledge that traceability and transparency into complex supply chains is difficult. But Goodman is committed to engaging and encouraging our tier 1 suppliers, where we have the greatest control and influence, to develop awareness and greater transparency of their supply base so that they can best manage risk and influence within their direct supply chain.

We expect our suppliers to have policies and procedures to identify and respond to any modern slavery or human rights risks and be willing to work with Goodman to remediate any issues. We ask for representations and evidence of their practices in order to mitigate their risks.

Varying legislative support and common law principles exist in each jurisdiction which influences the actions we can take. Goodman will respond appropriately to any legislative requirements globally around identified products in our supply chain that may in the future be prohibited.

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

Our approach

Goodman applies a group-wide tiered approach to modern slavery which allows for a consistent way to assess and address our risk (as detailed on page 17). This approach has been adopted and implemented by each region in a way that is appropriate for the relevant jurisdiction. Our global approach incorporates the key elements of our human rights and modern slavery program controls.

Our 2022 actions

Goodman procures from a broad and diverse global supplier network. A consistent focus for our procurement decisions is developing partnerships with suppliers that operate with aligned values and standards by considering social, environmental and human rights related factors.

This year Goodman developed its Sustainable Sourcing Framework (Framework) which provides strategic direction to achieve Goodman's overarching sourcing and supply chain objectives globally. This Framework will assist to protect human rights within our supply chain and to mitigate the risk of modern slavery, as well as respond to the social, environment and governance targets in our 2030 Sustainability Strategy.

We have developed a roadmap to help us successfully implement the Framework. The first step of the roadmap was engaging with our internal and external stakeholders to build awareness of our sourcing and supply chain objectives, and expectations. Internal working groups have also been established to support this task, and to help with implementation of the Framework in each of the regions where we operate.

This reporting year we also commenced the expansion of our Procurement policies to support the new Framework to prioritise environmental, social and governance objectives.

Goodman Group 2030 Sustainability Strategy

+ Sustainable Property
+ People and Culture
+ Corporate Performance

Sustainable Sourcing Framework

A framework to achieve Goodman's sourcing and supply chain objectives that support our sustainability goals.

Modern Slavery, Business Ethics and Social Procurement

Commitments and principles that shape our procurement practices, including our Global Procurement Principles, Code of Conduct, Workplace Safety and Modern Slavery policies.

Procurement Policy

Local Procurement policies adapted from our global principles.

We anticipate our new Framework and procurement decision making will see us increase the number of our suppliers that prioritise social, environmental, governance factors and we look forward to working with like-minded suppliers. As part of the implementation of the Framework in FY23, we will focus on embedding responsible sourcing practices that support decent working conditions and workers' rights.

We recognise that our suppliers operate in a variety of legal frameworks and cultural environments around the world. However, we believe that engaging consistently with our supply chain on our Framework will lead to broader positive change in our sector.

In parallel, we also commenced the development of a global operational and supplier standards and guidance in relation to human rights, modern slavery and labour protection. These will be incorporated into our Modern Slavery Policy which forms part of the Sustainable Sourcing Framework. The operational standards will cover our actions to assess and address modern slavery in relation to accountability for modern slavery issues, on-boarding, audit and compliance, stakeholder engagement, training, remediation avenues and annual review of progress. The modern slavery working group has consulted with each region on these expected standards that will be implemented in FY23.

We also updated and implemented our Statement of Business Ethics (Supplier Code of Conduct) which provides our environmental, social and governance standards, including commitments to human rights and modern slavery across operations and supply chains. This is being included in our procurement contracts.

Regional progress

During the year all regions made significant progress in implementing policies and actions to assist in addressing modern slavery risks associated with our operations and supply chains. Each region has incorporated the key elements of our human rights and modern slavery program controls and implemented actions in the key areas of governance, risk assessment, due diligence, engagement and remediation.

MODERN SLAVERY FUNNEL THAT ENABLES US TO HAVE A SYSTEMATIC APPROACH TO MANAGING RISK.

Governance

Continuing to raise awareness of modern slavery with our regional teams in the context of relevant legislation and our modern slavery strategy and commitments including growing and maturing understanding around procurement practices and training.

Risk assessment and supplier mapping

Mapped suppliers globally against key attributes including service type, geography and vulnerability to understand the risk that we are causing, contributing to, or directly linked to modern slavery through our operations and supply chains.

Due diligence

Regular supplier due diligence approaches including contractual mechanisms, supplier questionnaires or declarations and review approaches such as desktop, interview, onsite inspection, validation or deep dive.

Engagement and remediation

Developing proactive mechanisms to collaborate with our suppliers to develop their own best practice modern slavery risk mitigation and implementing grievance mechanisms and remedy.

Repetition

Building familiarity through engagement tools and provide modern slavery content on a regular basis so that it becomes part of normal business practice consideration.

Our progress on our commitments

1. 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. Our policy framework is actively communicated and enforced and seeks to ensure that our people and suppliers understand our expectations and can recognise when to raise a concern.

During FY22 our Corporate Governance Statement, Code of Conduct, Ethical Concerns Policy, Workplace Bullying & Harassment Policy and Anti-Bribery & Corruption Policy were reviewed to confirm, amongst other things, they are still aligned with our focus on modern slavery and human rights. We also developed the Sustainable Sourcing Framework and revised our Statement of Business Ethics (Supplier Code of Conduct) to seek to protect human rights and prevent modern slavery and labour exploitation.

The following polices 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.
Diversity and Inclusion 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.
Training and Communication Plan	Outlines the required training and communication for our people to promote our team members acting responsibly, ethically and in compliance with the law.

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.
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.

Goodman's Corporate Governance Statement and policies are available here.

2. Gender pay review

We continue to maintain robust internal processes and controls to comply with our legal and contractual obligations and to manage entitlements relating to our people. In FY22, Goodman undertook a gender pay review to identify any conscious or unconscious bias and to improve the integrity of outcomes with no significant issues identified.

3. Training and awareness

As noted in our previous modern slavery statements, training and awareness are key controls to address the risk of modern slavery as our people are critical to identifying any modern slavery or human rights issues. Goodman sets clear expectations that our team members should be alert to possible instances of modern slavery.

Goodman continues to educate our people, particularly those involved in supply chain management and procurement to identify red flags of modern slavery and the actions required to respond appropriately including in relation to our whistleblowing mechanisms. Goodman has focused on providing practical training designed to provide our people with the knowledge, tools and skills to:

+ Understand and describe what modern slavery is
+ Detail how to identify modern slavery in our supply chain
+ Recognise red flags
+ Understand our legal requirements and the actions we are taking
+ Provide an overview of our internal reporting procedures and how workers can report any concerns.

Goodman continues to use the Greenlight Compliance training program which consists of online modules and communications designed to assist team members navigate Goodman's Code of Conduct and other key policies and reinforces the importance of acting ethically and in accordance with our values. As part of the program Goodman implemented a comprehensive bespoke modern slavery training module during the year which is detailed on the next page.

With regard to supplier awareness and training, we are commencing the journey of encouraging suppliers to conduct their own training and awareness. A demonstrable example of this is in Brazil where our General Contractors have been asked to provide modern slavery training to their employees.

CASE STUDY

Bespoke Modern Slavery training

To better educate our people, a comprehensive modern slavery module was launched in FY22 as part of Goodman's Greenlight training program.
The module provided our people with an understanding of modern slavery, the risks in the property industry, what to look out for and where to go for more information.

100% of our people have received communications on the risks and responsibilities relating to modern slavery and over 90% of our people globally have completed the module.

We solicited feedback from our people on their improved understanding of modern slavery following the training, with positive responses received.

"GREAT COURSE ON MODERN SLAVERY AND A LOT OF GOOD INFORMATION WAS SHARED. IT OPENED MY EYES TO A VERY SAD AND MAJOR ISSUE IN OUR WORLD TODAY".

"YES, THE COURSE DID HELP ME GET A BETTER PICTURE OF MODERN SLAVERY".

Note: The module was rolled out in Australia, New Zealand, the United Kingdom, the US and a translated version in Japan with over 90% completion. Team members in Europe, China, Hong Kong and Brazil received face to face training on modern slavery in FY22.

GET THE GREENLIGHT TO
PREVENT MODERN SLAVERY

Goodman acknowledges that modern slavery is a global risk to human rights.

It is a serious form of exploitation present in global supply chains through a number of labour rights abuses including forced labour, debt bondage and child labour. We are committed to good business ethics across our operations and global supply chains. The protection of human rights of our people and every worker in our supply chain is aligned with our values and our commitment to safety and sustainability. Globally, working with our people, our suppliers and other stakeholders, we want to be vigilant and contribute to the fight against modern slavery.

We have recently updated our Statement of Business Ethics (Supplier Code of Conduct) to make clear the expectations of Goodman and our suppliers with regard to protecting human rights and preventing modern slavery.

We have also put together a short training module to help you understand what modern slavery is, the risks in the property industry, indicators of modern slavery and how to spot it in supply chains and where to go for more information. Click the button below to complete the module before 20 June 2022.

COMPLETE TRAINING

4. Due Diligence – a collaborative approach

Goodman has adopted a risk-based approach to modern slavery due diligence. Globally, we have focused on our tier 1 suppliers in our supply chains where we have a better level of influence. Our approach to sustainable and responsible sourcing also includes the development of preferred panels of service providers who are screened against our sourcing principles. Repetition of messaging is also a key approach to build a "new" standard practice which encompasses modern slavery principles.

Strengthening supplier contracts

One of the key ways in which we articulate our human rights expectations and control the potential risk of modern slavery arising in our global supply chains is through our contracting process with our direct suppliers. In FY22, we updated our Global Statement of Business Ethics (Supplier Code of Conduct) to reflect the expectations of our people and our suppliers with respect to human rights and modern slavery. We expect our suppliers to communicate these requirements within their own operations and supply chain.

In parallel, we commenced the review of our procurement contracts to incorporate the Statement of Business Ethics and other relevant modern slavery clauses.

An extract of our Statement of Business Ethics

Human rights

+ *Respect human rights and take reasonable steps to identify and assess risks of modern slavery practices in your operations and supply chains*
+ *Take all reasonable action to address any modern slavery issues in your supply chain and work with Goodman to remedy any instances of modern slavery*
+ *Source services, materials and products from ethical suppliers who comply with all relevant legislation and seek to avoid child labour and modern slavery.*

Within our European business, the Goodman Statement of Business Ethics has been translated into the six applicable languages (English, German, French, Dutch, Italian and Spanish) and each posted on the relevant country website. During the reporting period our European team also sent our revised Statement of Business Ethics to our new and existing suppliers. Communication of these standards will continue to be a key focus for FY23.

Monitoring – supply chain

Our focus for FY22 was on continuing to understand the level of modern slavery maturity and awareness amongst our suppliers. We also identified trends and any areas of elevated risk that require further engagement with our suppliers through effective due diligence mechanisms.

Human rights due diligence (onboarding and vetting processes)

Goodman undertakes a number of tendering opportunities annually. When tendering for work, suppliers are required to partake in a prequalification process. Compliance or external accreditation organisations, which verify and check documents, are commonly used for the first stage of vetting. For moderate to high risk areas, an additional control mechanism we use is supplier self-assessment questionnaires or declarations to identify red flags or ratings from external accreditation agencies.

In Australia, Goodman has continued to work with the Property Council of Australia, Informed 365 (the platform provider), other leading property companies and industry experts on the Ethical Sourcing Portal and supplier questionnaire. We have issued our modern slavery questionnaire to high-risk suppliers engaged by the Australian business in construction, cleaning, security and landscaping. The completion rate is 77% (well above the average for platform members at 28% completion). Goodman will continue to engage with suppliers that returned questionnaire responses warranting a closer look to ascertain whether there are appropriate controls in place to mitigate modern slavery risks.

The other regions are using independently implemented due diligence mechanisms appropriate to their risk profile such as:

+ Europe issued an extensive evidence based questionnaire to 25 high risk suppliers via Ecovadis
+ In Brazil, physical audits of contractors were conducted by an external third party. Audits may be undertaken monthly or more frequently dependent on the level of risk
+ In China/Hong Kong, a supplier declaration was issued to all panel property services and development suppliers with a 95% completion rate
+ In the US, a supplier questionnaire was issued to all General Contractors and Property Services suppliers
+ Japan completed a supplier questionnaire both in English and Japanese comprising key questions on modern slavery
+ UK completed their supplier categorisation and a desktop analysis on targeted suppliers which were deemed to be at higher risk (construction, office services and real estate services).

As part of our due diligence, we consider whether our suppliers are reporting entities, have completed a risk assessment of their own operations or conducted any modern slavery awareness training. We also consider their controls around outsourcing, oversight of migrant workers or recruitment fees and whether they procure goods overseas. We consider that suppliers with greater visibility of their operations and supply chains are more likely to operate efficiently, have better working relationships, and be able to assess and address risks including modern slavery. We acknowledge that engagement with suppliers and awareness is an important part of our modern slavery program, particularly for smaller suppliers who do not have significant compliance resources.

Our focus for FY23 remains on engaging with those suppliers that have indicated limited awareness and understanding of modern slavery. Engagement will occur through targeted awareness of our Statement of Business Ethics, supplier statements, declarations and questionnaires. In some regions, Goodman may also choose to undertake an audit of suppliers to monitor compliance, or in response to a potential breach of policy and standards.

Resourcing

Goodman acknowledges that modern slavery requires an ongoing commitment and recently recruited a new resource in our Group Procurement team to focus on responsible sourcing, ethical issues and addressing risks in our supply chain. We have also increased our Group and AU Sustainability resources in FY22 to assist in the implementation of our Sustainable Sourcing initiatives. Similarly, a Procurement resource is being recruited in Europe.

CASE STUDY

Brazil – Building robustness within the procurement lifecycle

Due to the higher level of risk of modern slavery in construction in Brazil our approach has been more direct and targeted. During the year, the Brazilian team implemented a comprehensive onboarding tool. They are now focused on influencing suppliers through the procurement process.

Clauses have been included in our General Contractors' contracts that require our suppliers to implement modern slavery policies, conduct regular training for their employees about modern slavery, have grievance mechanisms in place and be committed to remediation.

For procurement processes over a certain threshold, there is now a requirement for all tenderers to provide their modern slavery policy.

For General Contractors' subcontractors, we now mandate that they include clauses within their contracts with subcontractors that confirm they do not foster or support any practice related to work conditions similar to slavery.

Some other actions taken during the year include:

+ An ombudsman (whistleblowing) channel in Portuguese is being included on the Goodman website
+ Signage around sites that Goodman values health and safety and does not condone modern slavery. Any misconduct or non-compliance with internal codes are to be emailed to ouvidoria@goodman.com
+ General Contractors have been asked to insert signs on construction sites for workers on site (included subcontracted labour) to receive information about modern slavery and the General Contractor's grievance mechanisms (as demonstrated on the right).

Goodman

A GOODMAN PREZA PELA SUA SAÚDE E SEGURANÇA

+ A Goodman preza pela saúde e segurança dos seus funcionários e prestadores de serviço, e repudia qualquer prática de trabalho análogo à escravidão. Em caso de denúncia de desvios de conduta ou desconformidade com as normas vigentes e aos códigos e políticos internos da Goodman, escreva para: ouvidoria@goodman.com

+ Este canal é extremamente confidencial e seguro, garantindo imparcialidade na gestão do assunto e sigilo da identidade daquele que dele se utilizar e não desejar se identificar. Importante informar que a veracidade das informações providas é uma responsabilidade do denunciante e que todas as informações serão verificadas pelos responsáveis internos da Goodman que deverão tomar as ações cabíveis.

CONTATO:

ouvidoria@goodman.com

5. Engagement

Goodman continues to be committed to working collaboratively to drive change that addresses the causes of modern slavery. Collaboration with our peers, engagement with investors, customers and regulators is encouraged to leverage possible influence and cultivate shared learning.

We have established extensive supply chain relationships across each of our operating regions. We appoint General Contractors for the delivery of our developments, with whom we partner to deliver the quality outcomes we expect whilst also prioritising human rights, and other social and environmental factors. In FY23, we aim to engage further with our suppliers with respect to responsible sourcing and work with those who operate with similar values. Increasingly, we expect our procurement decisions to reward like-minded organisations.

Property Council of Australia (PCA) Modern Slavery Working Group

Goodman also seeks out partnerships where we can drive strategic initiatives and learn from others such as our involvement with the PCA National Sustainability Roundtable, National Social Sustainability Roundtable and the PCA Modern Slavery Working Group.

As part of our involvement in the PCA working group we collaborate with other leading property companies in Australia to better understand and remediate modern slavery risks associated with the property and construction sectors. The objective of the group is to identify opportunities for the property industry to collectively strengthen controls and adopt best practice. The group is supported by Better Sydney for subject matter expertise and project management, the Supply Chain Sustainability School for educational resources, and with Informed365 providing the technical expertise around the platform itself.

We also recognise the value of engagement, leadership, collaborative working and agreement of common principles with specialist consultants, government and NGO's and this will remain a key consideration for FY23.

PROPERTY COUNCIL of Australia

SUPPLY CHAIN SUSTAINABILITY SCHOOL

be++er sydney
+ building + community + sustainability +

INFORMED 365

6. Remediation

We remain committed to providing access to remedies through effective grievance mechanisms and will provide for, or cooperate in, remediation where we identify that we have caused or contributed to modern slavery.

Goodman has established an internal grievance mechanism and a remedy pathway to respond to issues of modern slavery or slavery-like conditions. This is in accordance with the principles for an effective grievance process outlined by the United Nations Guiding Principles on Business and Human Rights.

Grievance mechanisms

Grievance mechanisms – a mechanism accessible directly to individuals to raise a human rights concern, such as modern slavery, and lodge a complaint with a company or other entity to seek remedy.

During the reporting period, we continued to monitor the reports made via our grievance mechanisms made available to our people, contractors and external parties including suppliers and their workers.

No concerns were received via our whistleblowing mechanisms in relation to any modern slavery or human rights issues in Goodman's operations or supply chains during FY22. Our suppliers did not notify us of any issues either.

The channels exist to raise grievances about unethical or improper conduct such as potential instances of modern slavery or other human rights abuses.

The reporting of instances of unethical or improper conduct from our supply chain partners or the general community are encouraged, and can be initiated via the Goodman website or emailed anonymously to ethicalconcerns@goodman.com.

Our Ethical Concerns Policy is publicly available on our website. Our supply chain is made aware of this policy through our Statement of Business Ethics (Supplier Code of Conduct).

Our people receive training on our Ethical Concerns Policy and were separately reminded of the importance of it during the year via our modern slavery communications and training module.

As part of our modern slavery actions in FY22, we reviewed our grievance mechanisms to confirm our processes are trusted and accessible by external parties including vulnerable workers. We are including additional links on local websites and are in the process of including additional languages so that our mechanisms are more accessible.

The Japan and United Kingdom webpages have been updated as detailed below:

Japan

企業の不適切行為等に関してお問い合わせ・ご質問等がございましたら、こちらまでご連絡ください。

United Kingdom

If you would like to raise an ethical concern or have a question, please contact us here.

Remediation

Remediation is the process of remedying adverse human rights impacts, such as modern slavery, by seeking, to the extent possible, to restore the affected person/s to the position they were in before the impact occurred.

Remediation is an important component of our modern slavery program. Any concerns that are raised will be assessed and investigated and reported to the Risk and Compliance Committee and, if necessary, any significant concerns referred to our Goodman Group Boards.

As part of our modern slavery program, we also have documented the process to be undertaken if an instance of modern slavery in our operations or supply chains was identified. Our remedy pathway is detailed below:

REMEDY PATHWAY

Trusted, accessible and confidential

Goodman has in place a grievance mechanism to elevate and address worker concerns, and to act as an early warning system for modern slavery risks. Concerns can be initiated anonymously via the Goodman website or emailed to ethicalconcers@goodman.com

Independent advice and support

We will seek to work with regulatory authorities and expert advisors such as local NGOs as and when appropriate, and escalate any issues to the Board and relevant Committee.

Victim safety and protection

Responding to the identification of instances or suspected instances of modern slavery in a manner that ensures the safety and privacy of the victim and seeking their input into any remediation action plans. This will be different on a case by case basis.

Human rights approach

Remedying adverse human rights impacts, such as modern slavery, by seeking, to the extent possible, to restore the affected person/s to the position they were in before the impact occurred.

Supplier engagement

Where we are directly linked to modern slavery, we will engage with our suppliers on their remediation approaches. We also set clear expectations in our Supplier Code of Conduct that our suppliers should be alert to modern slavery risk and work to prevent and address it. We also encourage our suppliers to be open and honest about the challenges they face.

We know that adopting high standards is not enough. Goodman recognises that working with our suppliers to develop their capability to identify and respond to responsible sourcing challenges is important. This will be a continued focus in FY23 as part of the implementation of our Sustainable Sourcing Framework.

During this reporting period we had regard to the KPMG Australia and the Property Council of Australia guide on "Listening and Responding to Modern Slavery in Property & Construction: A Practical Guide for Effective Human Rights Grievance Mechanisms". We will continue to review our mechanisms in light of this in FY23.

Through our engagement with the PCA modern slavery working group and subject matter experts, we will continue to monitor how best practice on remediation develops, and continually refine our approach. Our preferred approach is to positively influence outcomes and behaviours of suppliers. We will look to work with like-minded organisations, and the Property Council of Australia on how best to address remediation concerns. Where instances of modern slavery arise, we will reach out to specialist organisations for guidance and external advice.

CASE STUDY

UK Construction Skills Certification Scheme

Effective grievance processes and remediation are important elements of our modern slavery program.

In the United Kingdom, Goodman uses a wide range of contractors to develop and manage our properties, including in the construction, cleaning, security and landscaping industries where there are risks to migrant and base-skilled workers in the provision of services to our properties.

One indicator of modern slavery is where workers do not have any form of personal identification. People smugglers are likely to confiscate passports, or even destroy them, so the victims are unable to try and escape their ordeal. This means the victims are caught in a cycle of slavery.

Construction faces an ongoing labour shortage. In the last two decades, migrant labour, particularly from the European Union (EU) has increasingly been supplementing the local ageing, mostly male workforce. In 2020, half of construction workers in London were born outside the UK[1].

The UK construction market has addressed this issue by introducing Construction Skills Certificate Scheme (CSCS) cards, which can only be obtained once the worker has been able to answer a governed set of fundamental questions, to both confirm their identity and competence in safely performing their job.

Goodman requires all contractors to have valid CSCS cards. We engage with third party health and safety consultants to provide external scrutiny of the competence of our workforce on site. Even before a contractor can tender for us, consultants review whether workers have the appropriate CSCS. This important measure means that one aspect of a modern slavery is addressed.

Australia

In Australia, we continue to use the modern slavery alert in our contractor induction app, Sine Pro. All contractors and subcontractors must use the Sine Pro app each time they visit a Goodman property, including construction sites. When signing in using the app, the contractor sees the alert setting out a list examples of what victims of modern slavery may experience. It also provides contact details for emergency services, the Australia Federal Police and non-government organisations who can provide support, confidential advice and translation services. In FY22, over 7000 workers attended Goodman sites and all were educated about modern slavery through the Sine Pro app. No concerns of modern slavery or human rights issues were raised through Goodman's grievance mechanisms.

Note 1: CITB (2021): citb-migration-and-uk-construction-report-2021.pdf

Assessing the effectiveness of our actions

In FY22, Goodman introduced Key Performance Indicators (KPIs) across our four key performance areas. Goodman will now use these key metrics to 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 that our business causes, contributes to, or is directly linked to and reports our progress to the Risk and Compliance Committee and Goodman Group Boards.

Goodman has reviewed our FY22 progress against our KPIs in each key performance area as detailed below:

Key performance area What are we assessing?	**Action** What are we doing?	**Measurement** Our key performance indicators (KPIs)	**FY22 Assessment**
Governance and risk management *Supply chain mapping and identifying high risk suppliers in our global operations and supply chains*	+ Goodman Group Boards and Risk and Compliance Committee oversight of modern slavery policies and processes + Policy review + Streamline approach and processes across the Group including supplier onboarding + External collaboration on key risks.	+ Provide updates to the Risk and Compliance Committee at least quarterly on modern slavery initiatives + Biennial review of key polices to ensure that modern slavery is properly considered + Maturity assessments or audit of processes conducted including supplier onboarding + Consider the risks identified in our strategy to address modern slavery.	Achieved – updates were provided to the Risk and Compliance Committee quarterly during FY22 Achieved – Goodman's suite of corporate governance policies were reviewed and updated during FY22 with reference to modern slavery adequately dealt with In progress – an internal review will be conducted to 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 In progress – our detailed risk-based mapping and procurement data will be further analysed to determine where modern slavery risks are most prevalent in our supply chain including further down our supply chain.

Key performance area What are we assessing?	Action What are we doing?	Measurement Our key performance indicators (KPIs)	FY22 Assessment
Due diligence and engagement *Due diligence – policies, contracts and monitoring with supplier questionnaires, declarations, deep dives, audits or site visits* *Engagement – process to engage with suppliers and workers regularly and transparently*	+ Supplier self-assessment questionnaire, declaration or review (including desktop, interview or deep dive) + Review of supplier responses + Contracts with modern slavery provisions + Developing Request for Proposal content to include Modern Slavery elements.	+ Seek to improve the completion rate of questionnaires or declarations year on year + Seek to enhance supplier understanding and awareness + Review the responses provided by suppliers and identify those that require further due diligence + Conduct reviews of higher risk suppliers (including desktop, interview, deep dive or site visits) + Goodman precedent documents reviewed for modern slavery or responsible sourcing commitments.	**Achieved** – all regions have followed up completions of supplier questionnaires or declarations in FY22 **In progress** – a focus going forward is enhancing supplier understanding **In progress** – a focus going forward is implementation of the revised Modern Slavery Policy to provide guidance as to red flags and further due diligence requirements **In progress** – a focus going forward is implementing further actions such as supplier deep dives and increasing physical presence at the supplier level where possible **Achieved** – our Statement of Business Ethics was updated during FY22.
Training and awareness *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.	**Achieved** – over 90% of Goodman team members have received modern slavery training **Achieved** – Goodman asked for feedback and positive responses were received that the training helped them understand more about the risks of modern slavery and the training delivered was relevant to our business.
Grievance mechanisms and reporting *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 received in the year. We reviewed our grievance mechanisms during the year and identified ways to enhance them, so they were more accessible by adding references to them on our local websites.

Goodman acknowledges that tackling modern slavery requires an ongoing commitment, effective engagement with our suppliers and collaboration with both the industry and NGO's. 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.

Over subsequent reporting periods we will continue to review and enhance our metrics and develop further metrics as required to assess the effectiveness of our actions, in line with continuous improvement.

Process of consultation

This Statement was prepared by our modern slavery working group which includes representatives globally from the business units of Procurement, Legal, Compliance, Risk and Sustainability. In the process of preparing this Statement, the modern slavery working group, the Risk and Compliance Committee and Goodman Group Boards have reviewed and provided feedback on its content.

The reporting entities actively engaged and consulted with all companies we each own or control in the development of this Statement. Monthly meetings were held with each region about the details of the reporting requirements and information regarding the actions we intend to take to address these requirements. The regions were also provided with relevant materials and updates during the reporting year.

Looking forward

Goodman is committed to identifying and remediating modern slavery risks which may exist in our supply chains and operations. We are committed to the below actions in the year ahead.

Operations commitments

+ Implementation of operational and supplier standards to provide guidance to our Procurement team
+ Review of our modern slavery maturity and global commitments
+ Measuring and reporting progress across our global commitments and reviewing our metrics

Supply chain commitments

+ Supplier onboarding to include modern slavery awareness communications
+ Repetition of awareness and overall messaging across multiple engagement interfaces with suppliers to make this "business as usual"
+ Greater engagement with suppliers on modern slavery issues and assessing global screening and qualification procedures including supplier deep dives
+ Confirming that grievance mechanisms are trusted and accessible by external parties including vulnerable workers at the supplier level.