



Anti-Modern Slavery Management Framework

1. Introduction

The Anti-Modern Slavery Management Framework (Framework) articulates Dexus's approach to managing modern slavery¹ and other related human rights risk in our operations and supply chain.

All employees are responsible for identifying and managing modern slavery risks, obligations, and issues on an ongoing basis.

The Anti-Modern Slavery Working Group (AMSWG) is responsible for the Framework as it relates to Dexus Funds Management Limited, Dexus Wholesale Property Limited, Dexus Wholesale Funds Limited, Dexus Asset Management Limited and all associated entities.

2. Coverage

This Framework covers Dexus's operations and business activities, as well as all tiers of Dexus's supply chain. It applies to all Dexus employees and suppliers, including external facility managers.

The Framework also applies Dexus's Fund Management business which consists of listed REITs, unlisted funds, real estate securities and Joint Venture Partnerships.

3. Objectives and Values

3.1 Objectives

Dexus's anti-modern slavery objectives are to:

- Identify and assess the existence of modern slavery within our operations (corporate and property), on our development projects and in our supply chains
- Implement a co-ordinated, integrated management approach to mitigate the risk of modern slavery
- Implement a response that creates positive outcomes and changing behaviour through awareness, education, and comprehensive training programs
- Take a collaborative approach to eliminating modern slavery and to share findings transparently

This Framework will guide Dexus's approach to managing modern slavery¹ and human rights issues, including:

- Freedom of Association
- Forced labour
- Slavery
- Domestic servitude
- Debt bondage
- Trafficking in persons
- Deceptive recruiting for labour or services
- Forced marriage
- Child labour

¹ As defined by the Commonwealth Modern Slavery Act 2018 (Cth)

Dexus acknowledges that modern slavery should be viewed on a spectrum that ranges from decent work conditions to serious exploitation and abuse². Dexus is committed to taking steps to identify and address modern slavery and conduct that may be a precursor to modern slavery, in our operations and supply chain. Dexus is focused on minimising the impact to the individual(s) and using our influence to foster continuous improvement.

3.2 Values

Dexus's purpose is to “**create spaces where people thrive**”. This purpose guides Dexus's anti-modern slavery management approach to consider what our stakeholders need to “thrive” when making decisions on the management of our portfolio and workspaces.

Dexus's corporate values are **openness and trust, empowerment, and integrity**. These values underpin how we operate our business and maintain our social license to operate. Dexus applies these values to our approach to anti-modern slavery and we aspire to the highest ethical standards to ensure we act with integrity.

We recognise that everyone is entitled to live a life that is free from fear, harassment, and discrimination, and that everyone is entitled to a universal set of human rights, as outlined in our [Human Rights Policy](#).

4. Responsibility for managing modern slavery

All Dexus employees are responsible for assisting in identifying and managing modern slavery risks in Dexus's business operations and supply chains, as well as ensuring compliance with the policies and procedures that underpin Dexus's approach to managing modern slavery risk, as outlined in section 7.

Employees who procure goods or services, members of the AMSWG and employees who have management responsibility have a duty to understand, promote and be accountable for compliance with the policies and procedures outlined in section 7. Employees who procure goods or services must ensure suppliers and service providers comply with Dexus's [Sustainable Procurement Policy and Supply Code of Conduct](#).

Corporate Executive Committee

The Corporate Executive Committee is responsible for:

- Ensuring the group's initiatives and policies that support anti-modern slavery and human rights in Dexus's operations and supply chains are effective
- Overseeing the modern slavery assurance program
- Managing reports made under Dexus's Whistleblower Policy or received through other grievance mechanisms that relate to modern slavery or human rights
- Overseeing the identification and management of emerging modern slavery and human rights risks
- Promoting a culture of best practice and continuous improvement

Managers

Dexus Managers must ensure that appropriate operating practices and procedures are in place for their business function. These practices and procedures must be supported by adequate supervision and controls.

Managers must also ensure that identified or suspected non-compliance with policies and procedures relating to modern slavery and human rights are reported to Compliance. Managers are responsible for ensuring that remediation plans and corrective actions are implemented on a timely basis.

Identified cases of actual (or potential) modern slavery or human rights issues should be reported to the Head of Governance, as soon as practicable.

Employees

All employees are responsible for:

- Understanding and complying with the policies and procedures that apply to their role
- Raising actual or potential modern slavery issues with their Manager or the Head of Governance. Issues can also be raised via Dexus's independent disclosure management service provider, Your-Call. Disclosures can be made anonymously
- Reporting identified breaches of policies or procedures relating to modern slavery to Compliance

² Boersma, M. and Nolan, J. (2019), 'Modern Slavery: A Global Problem' in *Addressing Modern Slavery*, UNSW Press, Sydney, p.10
[dexus.com](#)

Dexus has a Whistleblower Policy to support confidential and anonymous reporting of incidents. Employees who report a concern can do so without being subject to detrimental treatment.

4.1 Anti-Modern Slavery Working Group responsibility

The AMSWG is responsible for developing and implementing initiatives to ensure modern slavery risk management is embedded across the business in accordance with this Framework. The AMSWG is also responsible for maintaining an up-to-date view of anti-modern slavery best practice and emerging issues to guide Dexus's approach.

5. Governance

5.1 Board and sub-committee responsibility

The Dexus Funds Management Limited Board is ultimately responsible for the safety of Dexus's people, customers and communities including oversight of compliance with modern slavery regulations. The Board is responsible for approving Dexus's annual Modern Slavery Statement.

The Board has established the Board ESG Committee, Board People & Remuneration Committee, and Board Risk Committee to assist it with its responsibilities as outlined below.

Board ESG Committee

Oversight of Dexus's approach to managing modern slavery risk, including:

- Reviewing the effectiveness of the Group's initiatives and policies that support human rights (including anti-modern slavery) in our operations and supply chain
- Reviewing and endorsing to the Board, on an annual basis, Dexus's Modern Slavery Statement

Board People & Remuneration Committee

Oversight of Dexus's approach to managing modern slavery risk in the Dexus workforce.

Board Risk Committee

Oversight of the inclusion of modern slavery considerations into Dexus's approach to risk management.

The Dexus Wholesale Property Limited in its capacity as Responsible Entity of Dexus Whole Property Fund and Dexus ADPF, Dexus Wholesale Funds Limited in its capacity as Responsible Entity of Dexus Healthcare Property Fund and Dexus Asset Management Limited in its capacity as Responsible Entity of Dexus Convenience Retail REIT, Dexus Industria REIT and APN Real Estate Securities will be notified of any modern slavery issues identified within the respective portfolios.

Furthermore, the Dexus Wholesale Property Limited, Dexus Wholesale Funds Limited and Dexus Asset Management Limited boards will be consulted during the development of Dexus's annual Modern Slavery Statement.

6. Dexus's modern slavery risks

Direct Operations

The material human rights risks present in Dexus's direct operations are different to those in our supply chain.

While there exists a risk of modern slavery in our direct operations, the risk is considered low and is mitigated through a number of controls. Dexus employees are skilled white-collar professionals operating exclusively in Australia, and therefore are considered low risk with regards to child labour, forced labour, or other modern slavery practices.

Dexus's approach to human rights in our operations focuses on confirming individuals' rights to work in Australia and maintaining a safe, healthy and inclusive workplace.

Supply Chain

Dexus considers people in our supply chain to be at higher risk of modern slavery, as a result of:

- Use of low-skilled, contract, and/or migrant labour
- Subcontracting and use of third-party labour hire agencies
- Highly competitive and cost driven business sectors
- Procurement of specific materials (the production of which may involve modern slavery)
- Supplier operations in countries with weak or opaque commitments to human rights

Co-existing risks from Dexus's business activities and operations include:

- **Asset operations:** Facility management services that engage in a highly competitive market through outsourced agreements with contractors using low skilled and casual labour e.g. cleaning, landscaping, fit-outs/de-fits, waste management and security
- **Development:** Construction suppliers engaging sub-contractors using low skilled, migrant workers or labour hire providers
- **Materials:** Lack of visibility in manufacturing supply chains for construction materials (plumbing, electrical, mechanical components, masonry/tiles, sanitary ware, raw materials, IT hardware) and office consumables (marketing merchandising, PPE, uniforms, stationery, catering)
- **Business operations:** Offshore operational services, IT support or design services which is sub-contracted to countries with low labour costs and limited worker rights

7. Key areas of focus

This Framework identifies 7 key areas of focus. The objectives and key actions of each area of focus are outlined below.

i. Leadership & Culture

Leadership & Culture focuses on fostering a culture of best practice and continuous improvement with the aim of limiting the risk of modern slavery occurring in Dexus's business operations and supply chain.

Dexus has an active cross functional AMSWG responsible for overseeing Dexus's approach to combatting modern slavery. The AMSWG meets on a regular basis to design and track progress on operational initiatives across our building operations, developments, and corporate operations.

ii. Legal & Compliance

Legal & Compliance focuses on applying the highest standard of governance to address modern slavery across operations and the supply chain. This involves ensuring expectations and standards are understood by employees and suppliers and that these standards are embedded into policies, procedures, and service provider contracts.

The AMSWG partners with the business to develop and implement anti modern slavery and human rights policies, procedures and standards.

Dexus will ensure modern slavery considerations are incorporated into the investment process, including our direct property portfolio and indirect REIT investment portfolio.

iii. Supply Chain Engagement

Supply Chain Engagement focuses on ensuring modern slavery risk is assessed prior to entering and during operational and development procurement contracts by engaging with suppliers and service providers. Dexus is committed to partnering with our suppliers and service providers to encourage a culture of continuous improvements and open dialogue.

Supplier engagement may include supplier engagement surveys, spot check, interviews, audits, and other continuous improvement strategies to monitor and mitigate risk on an ongoing basis over the contract term.

Dexus adopts a risk-based approach when engaging with suppliers and prioritises suppliers who are considered higher risk due to their operations, industry, size, or location.

Dexus applies responsible purchase practices in accordance with our Sustainable Procurement Policy and Tendering Policy.

iv. Knowledge & Capability

Knowledge & Capability focuses on ensuring employees responsible for implementing Dexus's policies and standards that address modern slavery are appropriately trained to effectively identify and implement relevant actions.

Dexus provides a two year training program to employees. Year 1 covers all staff awareness training and is also provided to all new starters. Year 2 targets employees who procure goods and services (and members of the AMSWG) with specialised training.

Dexus provides training to suppliers on our practices to promote adherence to Dexus's standards. Dexus also provides awareness training to the workforces of suppliers to ensure they are aware of the basic rights of employees, information on how to identify the signs of modern slavery, and

how to report modern slavery grievances or seek advice through Dexus's confidential whistleblower service.

v. Collaboration & Stakeholder Engagement

Collaboration & Stakeholder Engagement focuses on ensuring Dexus adopts a collaborative approach and works alongside industry groups, industry peers, business partners, suppliers, investors and communities to combat modern slavery. This includes participation in forums such as the Property Council of Australia Modern Slavery Working Group and the UN Global Compact Modern Slavery Community of Practice to share learnings with our peers.

Dexus will actively engage with:

- Policy makers, workers' rights organisations, and local non-profit organisations to enhance the effectiveness of our modern slavery management approach
- Suppliers and service providers to identify modern slavery risks and collaborate with suppliers to ensure processes, policies and measures are in place to appropriately address these risks
- Customers, investors and third party capital partners to communicate our approach and to further develop actions to identify and manage modern slavery risks in our operations and supply chain

vi. Incident Management

Incident Management focuses on ensuring Dexus has an effective Whistleblower Policy and appropriate grievance procedures are in place to allow our employees, supply chain and relevant stakeholders to report a concern without being subject to detrimental treatment.

Dexus provides an independent third party (Your-Call) mechanism to encourage, protect and support the reporting of incidents, which is available to all Dexus employees and Tier 1 supplier workforces. Reports can be made anonymously. Any reports of actual or potential modern slavery issues will be publicly disclosed.

Dexus will ensure that appropriate remediation procedures are implemented and that the ongoing safety of the individual(s) is maintained. In the event of a modern slavery incident, we will seek independent expert advice on the most appropriate action.

Dexus acknowledges that some individuals may be reluctant to raise issues as they may fear losing their job, experiencing retribution from their employers or deportation due to their immigration status. Dexus will always focus on reducing harm to the individual(s). We will seek independent expert advice on the most appropriate manner in which to deal with the issue.

Dexus is committed to working with our suppliers to improve policies, procedures, and actions to ensure we don't cause any indirect harm to their workforce. Should further issues arise, Dexus will consider other appropriate actions acknowledging that the safety of employees is paramount.

vii. Monitoring & Reporting

Monitoring & Reporting focuses on ensuring Dexus has a reporting framework and evaluation methods in place to provide oversight, accountability, and the ability to measure the effectiveness of our governance approach to modern slavery.

Dexus has a modern slavery assurance program in place, with findings reported to the Board ESG Committee, Board Risk Committee and Board Audit Committee. Dexus will review the modern slavery assurance program on a regular basis to ensure it aligns with best practice and remains fit-for-purpose.

The AMSWG will report progress on actions to the Corporate Executive Committee and Board ESG Committee on at least a quarterly basis.

Dexus will submit to the Australian Border Force an annual Modern Slavery Statement outlining our actions to assess and address modern slavery risks in our operations and supply chain, in accordance with the Commonwealth Modern Slavery Act 2018 (Cth).

8. Policies

Dexus's modern slavery management approach is underpinned by policies and procedures which assist in the identification of modern slavery issues in our business operations and supply chains. Some of these policies include:

- Human Rights Policy
- Sustainable Procurement Policy and Supplier Code of Conduct
- Employee Code of Conduct
- Whistleblower Policy
- Risk Management Policy
- Tendering Policy
- Procurement Procedures
- Embargo Policy
- Recruitment Policy
- Work Health Safety and Liability Statement
- Stakeholder Engagement Guidelines

All policies can be accessed by all Dexus staff on Dexus's intranet.

9. Measuring effectiveness

Dexus uses a range of evaluation metrics and methods to assess effectiveness and continuously improve our approach to managing modern slavery risk. For each identified activity, Dexus has developed immediate, intermediate, and long-term outcomes, and how success is measured against these outcomes.

10. Management review

This Framework (and supporting policies) will be reviewed at least annually to ensure alignment with developments in best practice anti-modern slavery and human rights management, as well as emerging issues that are considered material to Dexus's business operations and supply chain.

Version	Document Owner	Author	Approving Authority	Approved Date
1	Governance	Josie Taslim	Anti-Modern Slavery Working Group CEC Board ESG Committee Dexus Board	7 Feb 2022 14 June 2022 20 June 2022 27 July 2022