

# CHARTER HALL GROUP HUMAN RIGHTS POLICY

## Purpose and Scope

Respect for human rights is a fundamental value of the Charter Hall Group (Charter Hall or Group). This Policy is guided by international human rights principles which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights, and in the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

This policy applies to all Group entities including any entities in which we hold a majority interest. Charter hall also expects business partners and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

## Definitions

**Human Rights** is defined in accordance with the Universal Declaration of Human Rights, proclaimed by the United Nations General Assembly in Paris on 10 December 1948, as a common standard of achievements for all peoples and all nations.

**International Bill of Human Rights** comprises the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights.

International Labour Organisation Declaration on Fundamental Principles and Rights at Work, including: Freedom of Association, Right to Organise and Collective Bargaining; Forced Labour; Minimum Age; Child Labour; Equal Remuneration; and Discrimination.

International and Australian Human Rights and Modern Slavery legislation, including but limited to the UK Modern Slavery Act (2015), the Commonwealth Criminal Code Act (1995), the NSW Modern Slavery Act (30, 2018) and the Commonwealth Modern Slavery Bill (2018).

**UN Guiding Principles on Business and Human Rights (2011):** Implementing the United Nations “Protect, Respect and Remedy” Framework, provides a global standard for preventing and addressing the risk of adverse human rights impacts linked to business activity.

UN Global Compact Ten Principles relating to Human Rights, Labour, Environment and Anti-Corruption.

Direct human rights pertain to the potential adverse impacts associated with our operations where we have direct operational control and accountability.

Indirect human rights pertain to potential adverse impacts associated with the activities of our suppliers, partners and business relationships and where we have less control, however can exert influence.

## Our Responsibilities and Our Process

### Our Commitment

Charter Hall Group operates within Australia, which has democratic processes and judicial independence, high standards of governance, with legislative regimes relating to human rights including labour standards, privacy and non-discrimination. We also endeavour to operate in alignment with UN Guiding Principles on Business and Human Rights and the UN Global Compact.

Our commitment is to manage our operations in line with the UN Guiding Principles, the UN Global Compact and international and Australian Modern Slavery legislation, which reflects both our business needs and the expectations of our customers and key stakeholders. In alignment with our corporate values, Charter Hall Group is committed to **ensure** maintaining ethical, environmental, and social standards and continuously improve their application throughout our operations, practices and our supply chain. This commitment extends to our Directors, employees, contractors, sub-contractors, consultants and our suppliers who we expect will conduct business in a safe, responsible and equitable manner and in compliance with all applicable laws, regulations and standards.

Charter Hall Group's commitment supports and acknowledges:

- The equal rights of our employees, customers, suppliers, and investors to be treated fairly and without discrimination
- Our respect and the rights of Aboriginal and Torres Strait Islanders
- Inclusion of all diverse groups in the communities in which we operate and their freedom of expression, religious and cultural beliefs, sexual orientation and gender identity with respect and dignity
- Freedom of association and collective bargaining
- The right to just and fair remuneration and a safe work environment
- Our expectation that our suppliers and business and community partners also respect the principles of human rights and operate in our assets and communities in an appropriate manner, and
- Human rights considerations in our Supplier Code of Conduct and our sustainable procurement practices.

Charter Hall Group rejects child labour, forced or compulsory labour and all forms of modern slavery in our operations, supply chain or in our business-partnerships.

## **Responsibilities**

| <b>Role</b>  | <b>Responsibilities</b>  |
|--|--|
| Board  | <ul style="list-style-type: none"> <li>• Approve this Policy</li> <li>• Review reporting from Management regarding potential material direct and indirect human rights impacts and risks in our business and operations</li> </ul>   |
| Charter Hall Group Audit Risk and Compliance Committee | <ul style="list-style-type: none"> <li>• Review the Policy annually in preparation for the annual review of human rights risks</li> <li>• Report the Charter Hall Group's performance in the Shared Value and Sustainability Report and/or at the intervals set in the Group's Policy Review Schedule.</li> <li>• Propose any required amendments and recommend those changes to the Board.</li> </ul>   |
| Executive Leadership Group                             | <p>In addition to the responsibilities as an employee:</p> <ul style="list-style-type: none"> <li>• Provide our stakeholders and communities appropriate mechanisms to raise grievances in relation to any adverse human rights impacts.</li> <li>• Provide our staff with appropriate training, knowledge, resources and tools to manage human rights obligations outlined in this policy.</li> </ul>   |
| Head of Sustainability and Community                   | <p>In addition to the responsibilities as an employee:</p> <ul style="list-style-type: none"> <li>• Facilitate discussions on potential material direct and indirect human rights impacts and risks in our business and operations</li> <li>• Facilitate the provision of staff training regarding human rights obligations</li> <li>• Report on performance in the Shared Value and Sustainability Report</li> </ul>  |
| Employees  | <ul style="list-style-type: none"> <li>• Undertake due diligence assessments of potential material direct and indirect human rights impacts and risks in our business and operations.</li> <li>• Act to mitigate and where appropriate, remedy or use our influence and leverage to remedy adverse human rights impacts.</li> <li>• Collaborate with our suppliers, business partners, stakeholders and communities to identify, mitigate and remedy these most important human rights risks and potential impacts.</li> <li>• Engage with our key suppliers to ensure that they are aware of their obligations outlined in this policy and our Supplier Code of Conduct.</li> </ul> |

## **Related Policies**

The Policy is to be read in conjunction with the Charter Hall Corporate Policies, which also outline our commitment to respecting and promoting human rights, including:

- Code of Conduct for Employees
- Code of Conduct for Directors
- Anti-Bribery, Fraud and Corruption Risk Management Policy
- Conflicts of Interest and Related Party Transactions Policy/Privacy Policy
- Diversity and Inclusion Policy
- Sustainability Policy
- Risk Management Policy

- Supplier Code of Conduct
- Risk Management Policy
- Work Health and Safety Policy
- WHS Contractor Management – Consultation and Permission to Work Pack

### **Policy review, ownership and version control**

This Policy will be reviewed at least annually by the Head of Sustainability and Community and will consider any change in legislative or regulatory requirements and changes in Charter Hall Group's operations.