

2021–2022 UNGC COMMUNICATION ON PROGRESS (COP)

ABOUT

The UNGC is a global movement of companies and stakeholders aiming to create a more sustainable world. To achieve this, the UNGC encourages companies to align their strategies and operations with its Ten Principles on human rights, labour, environment and anti-corruption, and to take strategic actions that advance broader societal outcomes through collaboration and innovation.

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This year, represents the first year for Vicinity to outline how we are making progress on the Ten Principles of the UNGC, after we became Participants in March 2021.

Message from our Chief Executive Officer & Managing Director



Dear Stakeholders,

Respecting and proactively promoting human rights is fundamental to Vicinity Centres' purpose of enriching community experiences. The success of our business and the value we create for our stakeholders relies on our ability to reimagine destinations of the future, creating places where people love to connect, and through this vision regularly engage with and successfully respond to the changing needs of our communities.

As a Participant, I am pleased to affirm Vicinity Centre's ongoing commitment to the Ten Principles of the United Nations Global Compact.

Jane Kelley

Grant Kelley CEO and Managing Director



Human Rights

PRINCIPLES	SUMMARY OF ACTIONS	SUSTAINABILITY REPORT REFERENCE/LINK
PRINCIPLE 1		
PROTECTION OF HUMAN RIGHTS	 Vicinity's corporate governance suite, including our Human Rights Policy, Code of Conduct and Supplier Code of Conduct and Whistleblower Policy all outline Group- wide responsibilities for upholding human rights in our operations and supply chains. In 2021, we updated our Supplier Code of Conduct to include more expectations of suppliers in relation to human rights and labour practices. We published our Second Modern Slavery Statement in December 2021, outlining the actions we have taken and the next steps to assess and address Modern Slavery risks in our operations and supply chains. We became Participants to the UNGC in March 2021 and have remained a member of Cleaning Accountability Framework (CAF), which addresses potential Human Rights and Modern Slavery issues in the cleaning industry. We also maintained our 3 Star Standard Certification through CAF of our Northland Asset. Vicinity engaged an independent expert consultant to complete a comprehensive risk assessment of our supply 	 Human Rights Policy Code of Conduct Supplier Code of Conduct Whistleblower Policy Vicinity Modern Slavery Statement Vicinity Sustainability Report: CAF Vicinity Sustainability Report: Supplier Risk Assessment
PRINCIPLE 2	chain, to identify any potential human rights and modern slavery risks. The risk assessment was completed on 799 of our highest spend suppliers.	
NO COMPLICITY N HUMAN RIGHTS ABUSE	 In FY21, we introduced modern slavery training and refresher training in relation to whistle blowing as part of our annual compliance training program for all staff to provide them with tools on how to recognise and report modern slavery concerns. We maintained reporting to the Risk and Compliance Committee on incidents raised and investigated through our whistleblowing channels. 	 Vicinity Modern Slavery Statement Vicinity Sustainability Report: Modern Slavery
	 During the FY21 reporting period, we were made aware of seven total grievances and investigated six with one grievance pending investigation which were raised with us by staff engaged by our contractors. None of these grievances were identified as incidences of modern slavery and no complicity in human rights abuses was identified. We consulted internally with various stakeholders to develop our Remediation Framework, to protect the Human Rights including the Health and Safety of our workers in both our direct operations and our supply chain. The Framework with be launched in FY22. 	

Labour

PRINCIPLES	SUMMARY OF ACTIONS	SUSTAINABILITY REPORT REFERENCE/LINK
PRINCIPLE 3		
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	 Vicinity respects and are guided by Fair Work Australia and Fair Work Act 2009 on individuals rights to freely join and/or form a trade union of their choice and their right to collective bargaining. Our approach is guided by our Human Rights Policy and Supplier Code of Conduct. 	 Human Rights Policy Supplier Code of Conduct
PRINCIPLE 4		
ELIMINATION OF FORCED LABOUR AND COMPULSORY LABOUR	 Vicinity Human Rights Policy explicitly precludes the use of forced labour. We published our Second Modern Slavery Statement in December 2021, outlining the actions we have taken and the next steps to assess and address Modern Slavery risks in our operations and supply chains. 	 Human Rights Policy Vicinity Modern Slavery Statement
PRINCIPLE 5 ABOLITION OF CHILD LABOUR	 Vicinity Human Rights Policy explicitly precludes the use of child labour. We published our Second Modern Slavery Statement in December 2021, outlining the actions we have taken and the next steps to assess and address Modern Slavery risks in our operations and supply chains. 	 Human Rights Policy Vicinity Modern Slavery Statement
PRINCIPLE 6		
ELIMINATION OF DISCRIMINATION	 Vicinity Human Rights Policy outlines our commitment to provide a fair, safe and healthy working environment for our people that is free from bullying, harassment, discrimination or other unacceptable forms of behaviours. Vicinity's Whistleblower Policy provides a mechanism for persons to report harassment. In 2021, we updated our Supplier Code of Conduct to include more expectations of suppliers in relation to human rights and labour practices, including obligations to treat each worker with dignity and respect, and not subject workers to harassment or discrimination. Bullying and harassment training is a compulsory component of all new employees on-boarding at Vicinity. Employees must complete this training on an annual basis in order to be eligible for their Short Term Incentives (STI bonus) as well. 	 Human Rights Policy Code of Conduct Supplier Code of Conduct Whistleblower Policy

Environment

PRINCIPLES	SUMMARY OF ACTIONS	SUSTAINABILITY REPORT REFERENCE/LINK
PRINCIPLE 7		
APPROACH	 Vicinity's Board is responsible for overall governance of our company and has oversight of our Sustainability Strategy, risks and opportunities including our approach to climate change. Vicinity's Sustainability Committee, chaired by our CEO and Managing Director, forms part of our management committee structure and allocates responsibility for Vicinity's sustainability agenda to the highest levels of the organisation. In 2021, Vicinity completed a comprehensive materiality assessment, supported by external stakeholder engagement, in order to identify and response to our key ESG risks. 	 Vicinity Sustainability Report: Sustainability Governance Vicinity Sustainability Report: Sustainability Strategy Vicinity Sustainability Report: Materiality Vicinity Sustainability Report: Industry Collaborations
	• Vicinity supports industry wide collaborative efforts to share knowledge and ideas in relation to the issue of precaution and participates in a number of multi- stakeholder including the Property Council of Australia's (PCA) National Sustainability Roundtable and the PCA Modern Slavery Working Group.	
PRINCIPLE 8 ENVIRONMENTAL RESPONSIBILITY	 Vicinity's Sustainability strategy and objectives are integrated into our Group strategy, which helps guide how we deliver strong, sustainable returns and shared value for all stakeholders. We are tracking well towards our Net Zero 2030 carbon target on our wholly owned assets (common mall areas) having reduced our energy intensity by 30% since June 2016. We are a supporter of the Financial Stability Board's Task Force on Climate Related Financial Disclosures (TCFD) and our climate-related risk disclosures and approach to managing climate-related risks and opportunities align with the TCFD Recommendations. Our short and long term commitments help us deliver Vicinity's sustainability strategy in a consistent and focused manner across the business. We track the progress against these commitments in our annual Sustainability Report. 	 Vicinity Sustainability Report: Sustainability Strategy Vicinity Centres Annual Report Vicinity Sustainability Report: Our Commitments

PRINCIPLES	SUMMARY OF ACTIONS	SUSTAINABILITY REPORT REFERENCE/LINK
PRINCIPLE 9		
ENVIRONMENTALLY FRIENDLY TECHNOLOGIES	 Vicinity's Environmental Improvement Program drives continuous improvements in operational energy, water and waste performance throughout our portfolio. 	 Vicinity Sustainability Report: Resource Efficiency Improvements
	• Vicinity have committed to Australia's largest shopping centre solar program and in FY21, Vicinity installed a further 4.6MW across our managed portfolio, totalling 30.6MW of solar installed across 19 of our managed assets since FY18.	 Vicinity Sustainability Report: On Site Solar Program
		 Vicinity Centres Annual Report
		Vicinity Centres Sustainability
	 Following a successful pilot, Vicinity continued the installation of smart water meters at our centres in FY21, with 826 smart meters now installed across 15 centres. 	Report: Waste and Recycling
	 As a retail property owner and manager, waste is one of our largest indirect environmental impacts. In 2021, we ran a pilot program using a Pulpmaster organics processing unit to reduce the amount of organic waste to landfill. Roseland's diversion rate increased from 26% to 65% at the end of FY21. 	

Anti-Corruption

PRINCIPLES	SUMMARY OF ACTIONS	SUSTAINABILITY REPORT REFERENCE/LINK
PRINCIPLE 10		
WORK AGAINST CORRUPTION	 Vicinity encourages a culture that embraces ethical practices, complies with all relevant regulations, and is accountable and transparent. This is supported by our Anti-bribery and Corruption Policy and our Whistleblower Policy. Our governance framework aligns with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition). Our Code of Conduct outlines at a high level the ethical business behaviour expected from our Directors, the Executive Committee, employees and contractors. All employees are required to complete mandatory annual training on our Code of Conduct. In 2021, we updated our Supplier Code of Conduct to include more expectations of suppliers in relation to human rights and labour practices, including obligations to not commit or be involved in bribery or corruption. 	 Anti-Bribery and Corruption Policy Whistleblower Policy 2021 Corporate Governance Statement Code of Conduct Supplier Code of Conduct Vicinity Sustainability Report: Ethics and Risk Management

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