

Human Rights Policy

GDI Property Group ("GDI")
GDI Property Group Limited (ACN 166 479 189)
GDI Funds Management Limited (ACN 107 354 003)

Dated 20 October 2022

GDI Property Group

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Human Rights Policy

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1 Overview

The Board and senior management of GDI Property Group (GDI) is committed to respecting the human rights principles outlined in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights; the International Covenant on Economic, Social, and Cultural Rights; the International Covenant on Civil and Political Rights; and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work).

This includes the rights of all individuals, including employees, contractors, tenants, and those in the supply chain.

2 Scope

The requirements of this policy apply to GDI's Board, Senior Management, employees and throughout the Group's supply chain.

3 Policy Principles

GDI is committed to ensuring that human rights are recognised and protected.

GDI will demonstrate its commitment to:

3.1 Human Rights in the Workplace

- a. Establish an open, trustworthy, and respectful relationship with employees;
- b. Maintain an effective grievance procedure that allows employees to file complaints or concerns without fear of intimidation or retaliation;
- c. Value diversity and inclusion of all people across the Group;
- d. Conduct business in a manner that upholds and respects fair labour practices and human rights, including modern slavery;
- e. Provide a workplace that is safe from physical and mental harm;
- f. Identify and assess the risks within the business;
- g. Address key risk activities and, if required, implement changes; and
- h. Comply with all relevant laws and regulations that relate to fair labour practices and human rights, including modern slavery.

3.2 Human Rights in the Supply Chain

- a. Establish an open, trustworthy, and respectful relationship with Tier 1 suppliers;
- b. Establish and maintain an effective grievance procedure that allows suppliers to file Modern Slavery complaints or concerns without fear of intimidation or retaliation:

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- c. Identify and assess the risks within its business and supply chains;
- d. Address key risk activities and, if required, implement changes;
- e. Educate employees and suppliers on their own responsibilities to identify risks and avoid modern slavery breaches;
- f. Collaborate with suppliers to enhance our program, including identifying further areas where each party can collaborate in the future; and
- g. Annually publish a Modern Slavery Statement voluntarily.

4 Breach of this Policy

- a. Compliance with this Policy will be monitored and any known or suspected breaches will be investigated.
- b. If a breach is found to have occurred, you may face legal or disciplinary action including termination of employment.

5 Related Documents

- Sustainable Procurement Policy
- Modern Slavery Statement
- Diversity Policy
- Code of Conduct

Approved by the Board on 20 October 2022

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