

ISPT HUMAN RIGHTS POLICY

December 2019



INTRODUCTION

ISPT is committed to environmental, social and governance (ESG) excellence as an integral part of our investment strategy. We maintain a 'do no harm' investment and operating philosophy, including in relation to human rights.

The purpose of this policy is to formally document and outline ISPT's human rights commitments.

The Board of Directors has oversight of our human rights approach. The Board has delegated responsibility for overseeing this policy the ISPT Environment, Safety and Operational Risk Committee (ESORC). Day-to-day implementation of this policy is a cross-functional effort by our business.

Through this policy we highlight our commitment to:

- respect the human rights of our employees, contractors, customers, communities, suppliers and other relevant stakeholders; and
- identify and appropriately respond to our human rights risks.

SCOPE

This policy applies to all directors, employees and independent contractors of ISPT and activities of the ISPT Group, including ISPT Operations Pty Ltd.

We also expect our business partners (including our Property Management Companies and suppliers), and joint venture partners to comply with this policy. We are committed to working across our value chain (including our tenants) to promote continuous improvement in this regard, both in relation to their own operations and business relationships such as suppliers.

OUR COMMITMENTS

We will respect all internationally recognised human rights as set in the International Bill of Human Rights (consisting of the United Nations Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights) and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, in line with the UN Guiding Principles on Business and Human Rights.

We will comply with all applicable Australian laws. Parts of our value chain, including our suppliers, may operate overseas and we will encourage them to follow the same approach where they operate.

In particular, we will apply the following principles in our approach.

Workers’ rights	Principles
Working conditions	<p>We will treat all of our employees and independent contractors fairly and with respect. We have policies in relation to the following:</p> <ul style="list-style-type: none"> • Safe and healthy environment • Fair remuneration • Reasonable working hours • Training and education • Flexibility to support personal commitments • Equal pay for equal work • Equal opportunity in career advancement • Privacy
Diversity and Inclusion	<p>We will not accept discrimination of any kind based on gender, sexual orientation, age, ethnic or social origin, politics, religion or any other recognised status. We embrace diversity and inclusion and strive for a safe and collaborative environment for all employees to reach their full potential. This is elaborated in our Diversity and Inclusion Policy.</p>
Freedom of association	<p>We recognise that every worker has the right to collective bargaining and to join or not join a trade union.</p>
Freedom from slavery and child labour	<p>We do not tolerate forced labour, child labour or other forms of slavery (including modern slavery as defined in the Australian Modern Slavery Act 2018).</p>
Indigenous peoples’ rights	<p>We acknowledge and respect the rights of Aboriginal and Torres Strait Islander Australians.</p>
Communities	
Access	<p>We aim to provide universal access across our properties and increase accessibility through regular refurbishment. We will respect the rights of persons with disabilities and other at risk or vulnerable groups in designing and monitoring access to our properties.</p>
Local impacts	<p>We will consider the impact of our business decisions on the environment and communities in which we operate and regularly engage with our communities to understand and respond to their changing needs.</p>
Integrity	Principles
Avoiding corruption	<p>We understand the impact that corruption may have on the realisation of human rights. We expect the highest integrity in all aspects of our business operations and take seriously the prevention of fraud and corruption. Our corporate policies are regularly reviewed and seek to eliminate corruption in all its forms, including bribery and extortion.</p>

IMPLEMENTATION

Our implementation of our human rights approach will be consistent with the UN Guiding Principles on Business and Human Rights.

We are committed to transparency around our human rights actions and recognise that our stakeholders will seek meaningful information on our human rights performance. Our communications will include statements under the Australian Modern Slavery Act 2018.

We will communicate this policy to directors, employees, independent contractors, business partners and joint venture partners, and ensure relevant staff are provided with the necessary training to implement our commitments.

We will continue to collaborate with industry peers and other businesses and stakeholders to formulate common approaches to managing human rights risks and to drive continuous improvement.

UNDERSTANDING CONCERNS AND HEARING COMPLAINTS

We recognise our responsibility to provide for or cooperate in the remediation of human rights harm which we identify we have caused or contributed to in line with the UN Guiding Principles on Business and Human Rights.

We encourage the reporting of human rights concerns by employees, independent contractors and other stakeholders including suppliers and their workers. These concerns can be raised through community complaints mechanisms operated by ISPT and our Whistleblower Policy.

FURTHER INFORMATION



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BREACHES OF THE POLICY

It is the responsibility of directors, employees, business partners and independent contractors to familiarise themselves with this Policy and to observe its provisions.

Breaches of this policy may lead to disciplinary action up to and including dismissal and termination of contract.

RELATED POLICIES

This policy provides the foundation of our human rights approach. ISPT policies that reflect and support our commitment to respecting and supporting human rights include:

- Statement of Ethics
- Code of Conduct
- Conflict of Interest Policy
- Whistleblower Policy
- Diversity and Inclusion Policy
- Flexible Working Policy
- Leave Policy
- Workplace Behaviour Policy
- Privacy Policy
- Responsible Investment Policy
- Fraud Policy
- Health, Safety and Environmental Compliance Policy.

REVIEW AND AMENDMENT

This policy will be reviewed at least every two years. Any amendments to this policy require the approval of the ISPT Pty Ltd Board.