



Human Rights Policy

Version 1.0
12 May 2017

1. Introduction

Respecting and proactively promoting human rights is fundamental to Vicinity Centres' (Vicinity) 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. We believe everyone is entitled to basic human rights and freedoms, regardless of where they are from, their religion, gender, race or any other status. To this end, we actively consider human rights within our own business as well as in our interactions with key stakeholders where possible, including how they relate to our employees, consumers and retailers, direct suppliers and the broader communities in which we operate.

Vicinity respects and supports the principles of human rights set out in the International Bill of Human Rights¹, and the eight fundamental Conventions of the International Labour Organisation.²

Vicinity additionally operates wholly within Australia, a country with high standards of governance and strong legislative systems that support human rights.

Our employees and contractors are expected to comply with this policy, in line with and in the spirit of Vicinity's purpose, values and the Code of Conduct, and we seek to work with our stakeholders to support our approach and standards.

2. Our Commitment

To deliver on our commitment, Vicinity will, where appropriate and possible:

- Offer a diverse and inclusive workplace that celebrates differences, allows flexibility to balance professional and personal needs, and promote diversity and inclusivity among our consumers, retailers, suppliers and communities in which we operate,
- Provide a fair, safe and healthy working environment for our people that is free from bullying, harassment, discrimination or other unacceptable forms of behaviours,
- Not tolerate or knowingly support the use of child labour, forced or compulsory labour in our operations or within our supplier and business partner relationships,
- Respect the right of our people to establish or join trade unions or other associations, and their right to collective bargaining,
- Provide a safe and healthy environment for team members, contractors, tenants, visitors and consumers,
- Respect our consumers' privacy and protect their personal information while enabling them to enjoy the experience of being physically and digitally connected,
- Respect and promote human rights in all of our engagement activities, and proactively connect with our stakeholders to understand and respond to their changing needs and aspirations,
- Consider the rights and needs of marginalised groups, continually striving to improve our centres' accessibility and inclusivity for all members in the community,
- Deliver lasting benefits to local communities where we operate, as per Vicinity Centres *Community Policy*.
- Manage social, environmental and human rights-related impacts with our suppliers, as outlined in Vicinity's *Sustainable Procurement Policy* and *Supplier Sustainability Code of Practice*,
- Undertake appropriate risk assessment of direct and indirect human rights issues in our operations and proactively work with our stakeholders to identify and mitigate any human rights related risks and impacts,
- Provide our stakeholders with appropriate channels to raise grievances related to any adverse human rights impacts,
- Work collaboratively with regulators and all levels of government to comply with applicable laws and regulations that support human rights and labour standards where we operate, and
- Report on our human rights related risks and impacts, management approach and performance in our annual sustainability report.

¹ International Bill of Human Rights consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights

² The ILO conventions address freedom of association, collective bargaining, forced labour, minimum age, worst forms of child labour, equal remuneration, and discrimination (employment and occupation)

3. Roles and responsibilities

The commitments outlined in this policy are implemented at a centre level, as well as by business functions in line with Vicinity's Sustainability Strategy, which aims to achieve broad value creation for Vicinity and our stakeholders.

3.1 Responsibilities of the Board of Directors

- Oversee Vicinity's Sustainability Strategy, and
- Review this policy in light of any material changes to our commitments, or otherwise, every two years.

3.2 Responsibilities of CEO and Managing Director and the EC

- Integrate the Policy into governance and business processes,
- Ensure that our approach to human rights is managed in line with this Policy, and
- Perform monitoring and reviews and notify findings to People & Culture, Health & Safety, Sustainability and National Procurement as necessary.

3.3 Responsibilities of Sustainability, People & Culture, Health & Safety, National Procurement

- Respond to queries on the application of this Policy,
- Regularly review this Policy in light of legislation, organisational changes and developments in best practice, or at a minimum, every two years,
- Support the business in the implementation of this Policy, and
- Reports to the CEO and Managing Director and EC on progress.

3.4 Responsibilities of all Vicinity personnel

- Understand and comply with this Policy.

4. Related Documents

4.1 Internal References

Vicinity's commitment to human rights is supported through a number of corporate policies, strategies and procedures to promote, monitor and evaluate compliance, including (but are not limited to):

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Fraud Policy
- Conflicts of Interest Policy
- Whistleblower Protection Guidelines
- Diversity and Inclusion Framework
- Flexible Working Arrangements Policy
- Health and Safety Policy and Procedures
- Procurement Policy
- Supplier Sustainability Code of Conduct
- Sustainable procurement policy
- Community Policy
- Environment Policy
- Sustainability Strategy
- People and Culture strategy
- Digital Strategy

Approved by,



Angus McNaughton
CEO and Managing Director

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