

HUMAN RIGHTS POLICY

Abacus Property Group (**Abacus**) recognises that respecting and proactively promoting human rights is an integral part of our business and is a key component of our broader sustainability strategy. Abacus operates wholly within Australia and New Zealand, countries which have democratic governments with high standards of governance and strong legislative systems that support human rights, national employment standard, privacy, anti-corruption and non-discrimination.

Abacus is committed to implementing and monitoring ongoing practices which support human rights with reference to the UN Guiding Principles on Business and Human Rights and the Australian Modern Slavery Act 2018.

Abacus' guiding principles include:

- the expectation that our employees, contractors, sub-contractors, consultants and suppliers will conduct business in a safe, responsible and equitable manner and in compliance with all applicable laws, regulations and standards;
- our employees, customers, suppliers and investors to be treated fairly and respectfully;
- diversity and inclusion, which is about our commitment to ensure collective perspectives are valued and respected, with the objective of enhancing informed judgement and high-quality decision making. Diversity includes, but is not limited to, gender, age, ethnicity, sexual orientation, religious and cultural background;
- the right to just and fair remuneration;
- the fundamental right of all workers and those affected by our undertaking to a safe and healthy working environment; and
- allowing freedom of association and collective bargaining.

Abacus ensures these commitments are upheld on an ongoing basis by:

- ongoing engagement, education and awareness with employees and our supply chain;
- developing and implementing a Supplier Code of Conduct;
- incorporating human rights into purchasing decisions;
- conducting human rights and modern slavery due diligence into our supply chains on an ongoing basis and ensuring our supply chains are, as far as we are aware, free from modern slavery; and
- providing access to an effective grievance mechanism (Whistleblowing Policy) to our employees and supply chain

Abacus rejects all forms of modern slavery in our operations, supply chain or in our business partnerships.

Abacus expects business partners and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

The Head of Compliance and Risk will be notified immediately in the event that a breach of human rights or modern slavery is found in our supply chain and Abacus will form a response committee, as appropriate.

This Policy provides the foundation for Abacus' commitment to human rights. The Policy is to be read in conjunction with the other Abacus corporate policies, which also outline our commitment to respecting and promoting human rights, including:



- Sustainability and Environment Policy;
- Employee Code of Conduct;
- Supplier Code of Conduct;
- Diversity and Inclusion Policy;
- Work Health and Safety Policy;
- Whistleblowing Policy; and
- Breach Policy.

ADOPTED: 15 August 2019
LAST BOARD REVIEW: 15 August 2019
COMPLIANCE AND RISK REVIEW: 30 November 2019