

# Human Rights Policy

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VER Limited (ACN 609 868 000) in its capacity as responsible entity of  
Waypoint REIT Trust (ARSN 613 146 464)  
Waypoint REIT Limited (ACN 612 986 517)

Approved by the Board and effective 17 August 2023

## 1. Introduction

- 1.1 This Policy documents the commitment of Waypoint REIT Limited and VER Limited as the responsible entity for Waypoint REIT Trust (together with its related bodies corporate) in respecting and supporting human rights of all people where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities.
- 1.2 This Policy is guided by:
- the International Bill of Human Rights.
  - the ten principles of UN Global Compact (**UNGC**).
  - UN Guiding Principles on Business and Human Rights.
  - Universal Declaration of Human Rights (**UDHR**).
  - Labour standards set out in the International Labour Organisation's (**ILO**) Declaration on the Fundamental Principles and Rights to Work.
- 1.3 Respect, excellence, integrity, and trust are considered integral to the way our business operates and conduct that disrespects the rights and dignity of people is inconsistent with these values.
- 1.4 Waypoint REIT recognises that human rights concerns can arise not only in its own operations, but also via interactions with external parties – in particular, business relationships, consultants, investments, supply chain management and the communities served.
- 1.5 Waypoint REIT has developed a Policy, which prohibits Waypoint REIT, and its subsidiaries from engaging in activity where it could be complicit to human rights abuse. In the context and spirit of Waypoint REIT's values and Code of Conduct, Waypoint REIT also seeks to work with third parties who abide by these principles and demonstrate good ethical practice.
- 1.6 Waypoint REIT rejects child labour, forced or compulsory labour and all forms of modern slavery in our operations or in our business partnerships.
- 1.7 Waypoint REIT operates within Australia and is committed to complying with applicable laws that support human rights including labour standards, privacy, and non-discrimination. These laws apply to Waypoint REIT as well as anyone who is employed by or works at Waypoint REIT, including employees (whether permanent, part-time, fixed-term or temporary), contractors, sub-contractors, consultants, secondees, directors and suppliers.
- 1.8 The Board has overall accountability of this Policy and Senior Management are responsible for the management of human rights within each business area. This includes ensuring compliance with this Policy.

## 2. Application of this Policy

- 2.1 This Policy:
- (a) applies to anyone who is employed by or works at Waypoint REIT, including employees (whether permanent, part-time, fixed-term or temporary), contractors sub-contractors, consultants, secondees, directors and suppliers;
  - (b) outlines expectations that Waypoint REIT expects its customers, suppliers and other persons with whom it has business relationships to consider the human right implications of their actions and decisions and respect human rights;
  - (c) does not have regard to the employment length of service, title or relationship to Waypoint REIT;

- (d) applies to physical offices of Waypoint REIT; and
- (e) extends outside of the offices of Waypoint REIT (such as off-site meetings, visits to property owned by Waypoint REIT, business travel, business social events and to electronic communication).

### 3. Related Policies and Processes

3.1 This Policy provides the basis for Waypoint REIT's human rights approach and is supported by various policies and procedures that reflect Waypoint REIT's commitment to advocating and promoting human rights:

- *Code of Conduct*
- *Anti-Bribery and Corruption and Anti-Terrorism Financing Policy*
- *Conflicts of Interest Policy*
- *Diversity Policy*
- *Outsourcing (External Service Provider) Policy*
- *Privacy Policy*
- *Related Party Transaction Policy*
- *Risk Management Framework*
- *Supplier Code of Conduct*
- *Trade Control Policy*
- *Whistleblower Policy*

### 4. Commitments

4.1 Waypoint REIT is committed to upholding human rights by:

- Not tolerating bribery and corruption in any form, as articulated in our ***Anti-Bribery and Corruption and Anti-Terrorism Financing Policy***.
- Providing a just and fair remuneration including gender pay equality and a healthy and safe work environment for our employees that is free from discrimination, harassment – including sexual harassment, vilification, or bullying of any kind. Providing leave entitlements and other benefits enabling employees to enjoy the right to family, recreation, work-life balance and a focus on wellbeing.
- Not tolerating the use of child labor, forced or compulsory labor or other forms of modern slavery.
- Promoting an inclusive and diverse workplace that offers equal opportunity in developing skills and career advancement.
- Communicating and providing training on this Policy and modern slavery to employees to raise awareness among employees and support them to identify and report concerns about human rights and modern slavery.
- Respecting and supporting employees' rights of freedom of association and collective bargaining agreements.
- Our expectation that our external service providers also respect the principles of human rights and operate in an appropriate manner.
- Procuring goods and services responsibly while taking into consideration human rights (see our Supplier Code of Conduct).
- Acknowledging that human rights risks may exist within Waypoint REIT's operations and supply chain, committing to identify and address those risks, and responding to remedy any human rights issues.
- Right to be treated with respect. As outlined in our ***Privacy Policy***, respecting the right to privacy by protecting the personal and sensitive information we hold.
- Committing to maintaining effective grievance mechanisms and encouraging prompt and transparent reporting of human rights concerns.
- Committing to monitoring the effectiveness of our human rights policies and processes, to support continuously enhancing how we address human rights.
- Provide reporting on human rights related risks and impacts, management approach and

performance in our annual Sustainability Report and Modern Slavery Statement available on the Waypoint REIT's website.

## 5. Labour Rights

5.1 Waypoint REIT is committed to the following principles:

- No child labour or forced labour is used, and that employment is freely chosen;
- Employees have fair wages and employment agreements including gender pay equality;
- Work hours do not exceed the maximum limit set by relevant legislation;
- All workers are free to exercise their right to form and/or join trade unions and to bargain collectively;
- Workers experience fair and equal treatment and access to opportunity, and enjoy a work environment that is free of discrimination, harassment, intimidation or coercion relating directly or indirectly to the protected attributes set out under discrimination below;
- All workers' health, safety and wellbeing is protected in the workplace; and
- Workers have access to fair procedures and remedies.

## 6. Discrimination

6.1 Waypoint REIT is committed to inclusion and diversity, focusing on shared values, experiences and aspirations. Our leaders are accountable for promoting diversity and inclusiveness.

## 7. Privacy

7.1 Waypoint REIT is committed to treating the right to privacy as a fundamental human right in line with the International Covenant on Civil and Political Rights. As part of this commitment, we collect, store, and handle personal information in accordance with the Australian Privacy Principles in the *Privacy Act 1988* (Cth). Our **Privacy Policy** sets out how Waypoint REIT handles personal information and can be found on Waypoint REIT's website <https://waypointreit.com.au/investors/?page=privacy-policy>.

## 8. Consequences of Breaching this Policy

- 8.1 Waypoint REIT does not tolerate behaviour that is in breach of the law or Waypoint REIT's policies. Waypoint REIT also upholds and supports the right to equal treatment without discrimination or harassment. Discrimination and harassment are prohibited.
- 8.2 Anyone who is employed by or works at Waypoint REIT, including employees (whether permanent, part-time, fixed term or temporary), contractors, consultants, secondees and directors found to have engaged in conduct constituting discrimination and/or harassment may be subject to disciplinary action, up to and including termination of employment. Breach of this Policy may also expose an individual to criminal and civil liability and could result in imprisonment or the imposition of a significant financial penalty.
- 8.3 Breaches of this Policy by suppliers to Waypoint REIT may result in remedial action, including termination of business relationships and relevant authorities notified depending on the nature of the breach.
- 8.4 Our people should never threaten, punish, or take disciplinary or retaliatory action against anyone inside or outside Waypoint REIT, for raising or helping to address a human rights concern.
- 8.5 The Board will be informed of any material breaches of this Policy.

## 9. Due Diligence, Monitoring and Review

- 9.1 Waypoint REIT assesses the human rights context of our activities, including impacts we may cause and those we may contribute or be directly linked to. Should a material change occur, specifically within our operations or supply chain, Waypoint REIT will conduct a review of our human rights risk and impact assessment to ensure that all risks and potential impacts are captured. The human rights risk and impact assessment helps determine the prevention, mitigation and/or remedial measures required to protect and uphold human rights. In addition, Waypoint REIT will update our risk management processes and training to support our employees in responding to these changes.
- 9.2 Waypoint REIT understands that human rights due diligence is an ongoing process – one which is most effective when it is embedded in the risk and procurement processes of our business. As such, we have put into place appropriate systems and controls to identify and assess our human rights risks on an annual basis and integrate those findings to manage them effectively. We will take appropriate action to cease or prevent adverse human rights impacts that we have identified or that have been brought to our attention.
- 9.3 We publish an annual Modern Slavery Statement, made in accordance with the *Modern Slavery Act 2018* (Cth).
- 9.4 In addition, key external service providers are expected to comply with Waypoint REIT's **Supplier Code of Conduct**.
- 9.5 Relevant monitoring, oversight and review processes will be undertaken to review the effectiveness of Waypoint REIT's human rights commitments and modern slavery requirements as specified in related policies, processes, frameworks and/or action plans.

## 10. Training and Communication

- 10.1 Training on this Policy forms part of the induction process for anyone who is employed by or works at Waypoint REIT. All employees will receive relevant training on how to implement and adhere to this Policy annually.
- 10.2 Waypoint REIT reports to stakeholders on the work we are doing to respect human rights within our operations and supply chains, through conducting reviews of our **Human Rights Policy** and publicly disclosing this in our Modern Slavery Statement.

## 11. Complaints

- 11.1 Waypoint REIT is committed to addressing human rights grievances and providing appropriate avenues for affected individuals or communities to come forward. Internal grievance systems and an external hotline are in place globally, along with a whistle-blower hotline.

## 12. Policy Amendments, Reviews and Publication

- 12.1 This Policy cannot be amended without approval by the Board.
- 12.2 The Waypoint REIT General Counsel and Company Secretary will review this Policy and related procedures from time to time to check if reports or breaches were appropriately recorded, investigated, and responded to and ensure this Policy and related procedures reflect changes in human rights requirements and meet best practice standards for Waypoint REIT.
- 12.3 This Policy will be made available on the Waypoint REIT's website.

## ANNEXURE A – Definitions

For the purpose of this Policy, the following definitions apply:

**Board** means the board of the Company or the board of any of its subsidiaries.

**Company** means Waypoint REIT Limited ABN 35 612 986 517.

**General Counsel** means the General Counsel of the Company.

**Policy** means this policy.

**Responsible Entity** means VER Limited, as responsible entity for the Trust.

**Seconded** means an individual who is seconded temporarily to Waypoint REIT but who is not employed by Waypoint REIT.

**Trust** means the Waypoint REIT Trust ARSN 613 146 464.

**Waypoint REIT** means each of the Company and the Trust and their wholly owned subsidiaries or any of them, as the context requires.