

# 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 15 August 2024

## 1. Introduction – Commitment to Human Rights

- 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 made with regard to:
  - 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 Waypoint REIT has four core values; Respect, Excellence, Integrity and Trust and these 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.
- 1.6 Waypoint REIT operates within Australia and is committed to complying with applicable laws that support human rights including labour standards, modern slavery, privacy, and anti-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.
- 1.7 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 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. Respecting and Promoting Human Rights

3.1 Corporate policies that reflect and support our commitment to respecting and promoting human rights include:

- *Code of Conduct*
- *Anti-Bribery and Corruption and Anti-Terrorism Financing Policy*
- *Conflicts of Interest Policy*
- *Diversity Policy*
- *Flexible Working Policy*
- *Gifts and Hospitality Policy*
- *Outsourcing (External Service Provider) Policy*
- *Privacy Policy*
- *Related Party Transaction Policy*
- *Risk Management Framework*
- *Supplier Code of Conduct*
- *Trade Control Policy*
- *Whistleblower Policy*
- *Work, Health, Safety and Environment Governance Framework*

3.2 These policies promote and respect fundamental human rights such as:

- Right to equality.
- Freedom from victimization, discrimination, harassment, including sexual harassment, vilification, or bullying.
- Right to a safe work environment.
- Right to family life.
- Right to rest and leisure.
- Right to fair remuneration.
- Right to privacy.
- Right to freedom of association.
- Right to collective bargaining.
- Freedom of thought, conscience and religion.
- Rights of Indigenous peoples.

3.3 Waypoint REIT is committed to the following principles for its people:

- We strongly support and promote the rights of our Employees and contractors and aim to create a vibrant, safe, and inclusive work environment. Our core values and Waypoint REIT's **Code of Conduct** set the behaviour and conduct expected of all Waypoint REIT directors and employees and any third-party acting on our behalf.
- A workplace free from slavery as defined by the Australian *Modern Slavery Act 2018* (Cth) (**Act**), including forced, bonded, involuntary, child labour or human trafficking, and that employment is freely chosen.
- 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 rights of freedom of association and negotiate collective bargaining agreements.
- Workers experience fair and equal treatment and access to opportunity and career advancement 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 Section 4 of the Policy.
- A safe workplace that promotes health, safety, and wellbeing.
- Workers have access to fair procedures and remedies; and

- the right to privacy and respect, as outlined in Waypoint REIT's **Privacy Policy**, respecting the right to privacy by protecting the personal and sensitive information we hold.

## 4. Discrimination and Harassment

- 4.1 Waypoint REIT is committed to fostering an inclusive and equitable environment for all individuals. We maintain a zero-tolerance policy for any form of harassment (whether sexual harassment and non-sexual harassment) or bullying including discrimination of any kind, including but not limited to, discrimination based on race, colour, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law.
- 4.2 Waypoint REIT provides annual mandatory training for all employees on discrimination and harassment to help our employees understand the importance of diversity, equity, and inclusion, and to equip them with the skills to support these values in their daily interactions.
- 4.3 Waypoint REIT provides equal opportunities in employment, education, and services. Our policies and practices are designed to ensure that everyone has the chance to succeed and thrive without facing discrimination.
- 4.4 Waypoint REIT has procedures in place to address and resolve complaints around discrimination and harassment promptly and fairly. We encourage all employees to speak up if they witness or experience any form of discrimination and harassment. All reports of discrimination and harassment will be investigated thoroughly and impartially. We ensure that the rights of all parties are respected during the investigation process. Retaliation against anyone who reports discrimination or participates in an investigation is strictly prohibited and will result in disciplinary action. For further information around reporting complaints, please refer to Waypoint REIT's **Complaints Handling Policy** and **Whistleblower Policy**.
- 4.5 In cases where discriminatory behavior or harassment is reported and verified, we are committed to taking appropriate corrective and disciplinary actions. These actions may include verbal or written warnings, mandatory training, placing the individual on a probationary period to monitor behaviour and improvement, suspension or termination of employment or affiliation with Waypoint REIT for severe or repeated violations.
- 4.6 Our leaders are accountable to these commitments and for promoting diversity and inclusiveness through feedback mechanisms, and transparent reporting in our annual **Corporate Governance Statement** and **Sustainability Report**.

## 5. Due Diligence, Monitoring and Review

- 5.1 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.
- 5.2 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 on an annual basis potential and actual human rights risks in order to systematically evaluate and assess risks across our operations, supply chains and in any new business

relationships (for example, mergers, acquisitions, joint ventures etc.) as part of our annual risk review;

- where appropriate, develop and implement action plans to prevent or mitigate identified human rights risks, including specific measures and responsibilities; and
- monitor the effectiveness of our actions in preventing and mitigating human rights impacts. 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.

5.3 Communicate our human rights due diligence efforts, including providing accessible information on how we address human rights impacts, and outcomes to stakeholders, including through our annual **Sustainability Report** and **Modern Slavery Statement**, made in accordance with the Act available on Waypoint REIT's website. Waypoint REIT's ESG Working Group is responsible for oversight and management of Waypoint REIT's modern slavery obligations and is comprised of cross-functional representatives across a number of functions, including Waypoint REIT's Chief Financial Officer, General Counsel and Company Secretary, General Manager Property and the Financial Controller.

5.4 In addition, key external service providers are expected to comply with Waypoint REIT's **Supplier Code of Conduct**.

5.5 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.

## 6. Grievances Mechanisms and Remediation

6.1 Waypoint REIT is committed to addressing human rights grievances and providing appropriate avenues for affected individuals or communities to confidently and anonymously raise concerns about potential or actual human rights impacts in our operations and supply chain.

6.2 Waypoint REIT is also 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).

6.3 Waypoint REIT employees, suppliers, and related external parties can confidentially report concerns about improper conduct by Waypoint REIT or its suppliers, and all grievances will be addressed promptly and fairly, with appropriate remediation provided to affected individuals or stakeholders. Internal grievance systems and an external hotline are in place globally, along with a whistleblower hotline. For further information around grievances mechanism available, please refer to Waypoint REIT's website:

- **Complaints Handling Policy:** which includes contact details for Waypoint REIT's Complaints Manager and Australian Financial Complaints Authority.
- **Whistleblower Policy:** which includes contact details for Waypoint REIT's Whistleblower Protection Officer and independent service provider "Stopline".
- **Privacy Policy:** which includes contact details for Waypoint REIT's Privacy Officer and the Office of the Australian Information Commissioner.
- **Waypoint REIT Securityholders:** The complaints mechanism outlined on the Waypoint REIT's website which includes contact details for Link Market Services Limited as Waypoint REIT's Registry and Securityholder Service Centre; and the Australian Financial Complaints Authority.

## 7. Training

- 7.1 Training on this Policy forms part of the induction process for anyone who is employed by or works at Waypoint REIT.
- 7.2 Annually, all employees and directors will receive relevant training on this Policy and modern slavery to raise awareness among employees and support them to identify and report concerns about human rights and modern slavery.

## 8. Consequences of Breaching this Policy

- 8.1 Waypoint REIT also upholds and supports the right to equal treatment without discrimination or harassment. Waypoint REIT has a zero-tolerance for discrimination and harassment.
- 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. Policy Amendments, Reviews and Publication

- 9.1 This Policy cannot be amended without approval by the Board.
- 9.2 Waypoint REIT's General Counsel and Company Secretary is responsible for overseeing the approach and implementation of this Policy across Waypoint REIT, including the continuous improvement of reporting practices, risk management, actions, and effectiveness measures.
- 9.3 Waypoint REIT's 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 emerging human rights issues, regulatory developments and meets best practice standards for Waypoint REIT.
- 9.4 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:

**Act** means the *Modern Slavery Act 2018* (Cth)

**Board** means the Board of the Company and the Board of the Responsible Entity.

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

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

**Employee** means an employee of Waypoint REIT Limited or any of its wholly owned subsidiary and include full-time, part-time, and fixed term employees.

**ESG** means environmental, social and governance.

**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.