Human Rights

Why this is important to Stockland

In accordance with the UN Guiding Principles on Business and Human Rights, we are committed to respecting and promoting human rights consistent with the International Bill of Rights (including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights) and with the eight fundamental Conventions of the International Labour Organisation.¹

We operate wholly within Australia, a country with a long history of democratic government, judicial independence and high standards of governance and with legislative regimes relating to human rights including labour standards, privacy and non-discrimination. Our commitment to both respect and promote human rights underpins our business activities and stakeholder relationships, and this is appropriately reflected in our human rights policies and procedures. We do not tolerate behaviour that is in breach of the law or our corporate policies.

This Deep Dive is a component of our FY19 sustainability reporting suite, which is publicly available on our website. Our sustainability reporting is third-party assured and drafted in accordance with the GRI Standards.²

This Deep Dive is to be read in conjunction with our published approach to human rights, available as part of our sustainability reporting suite at Our Management Approach to Human Rights.

Our key achievements

- Developed an industry supply chain survey tool in partnership with 15 member groups of the Property Council of Australia to strengthen property industry approach to human rights and other social and governance considerations within the supply chain
- Partnered with the Australian Business Community Network (ABCN) to sponsor six Indigenous scholarships for high school students and to pair them with Stockland mentors. We have committed to providing a further two scholarships to be announced at the end of 2019.
- Corporate procurement activities have utilised over $3.6 million from Indigenous suppliers since 2014.
- Increased our Australian Workplace Equality Index Score to 94/200, by 194% increase from FY18, reflecting the efforts made on our LGBTI+ inclusion and diversity practices.
- Continued our commitment to inclusive play by building three new inclusive playspaces in collaboration with our Foundation partner Touched by Olivia. In our Residential Communities we delivered Newport (Qld) and Elara (NSW) and Birtinya (Qld) and Burleigh Heads (Qld) in our Commercial Property Portfolio.
- Piloted BindiMaps, an app based wayfinding system for people who live with vision impairment using beacon technology, in selected retail centres.

¹ These conventions address freedom of association, collective bargaining, forced labour, minimum age, worst forms of child labour, equal remuneration and discrimination (employment and occupation).
² The GRI Standards are global standards for sustainability reporting published by the Global Reporting Initiative (https://www.globalreporting.org/standards/).

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- Delivered 18 per cent of our Residential built form product to Silver Level LHA (Livable Housing Australia) design standard
- Delivered a quiet room at Stockland Birtinya (Qld).

## FY19 priorities and progress

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<th>FY19 PRIORITIES</th>
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<td>Develop a formal response to the recommendations of the human rights issues review and use FY19 to commence implementation of agreed recommendations.</td>
<td>In progress</td>
<td>We have actioned several of the key recommendations from our Human Rights Risk Review, including the development of a supply chain industry survey tool and an organisation-wide culture review. We will continue to address recommendations from the review throughout FY20.</td>
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<td>Create an industry survey tool in collaboration with our industry peers to assist with transparency in the supply chain around ethical sourcing, in an effort to reduce/prevent the incidence of modern slavery (key priority resulting from human rights issues review).</td>
<td>Achieved</td>
<td>The property industry supply chain survey tool has been developed with input from 15 member groups of a Property Council of Australia working group. Piloting the tool will commence in early FY20 in line with the introduction of the Modern Slavery Act.</td>
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<tr>
<td>Complete a review of our organisational culture with regard to Stockland’s values, strategy and societal expectations (key priority resulting from human rights issues review).</td>
<td>Achieved</td>
<td>Undertook a review of our culture during FY19, led by independent external advisor, which included decision making, ‘ways of working’, leadership effectiveness and employee experience. This work was completed and discussed at Executive, Board and General Manager level. Findings were reviewed against our values, strategy and stakeholder expectations and a plan has been developed to strengthen the culture, which is currently being implemented with deeper engagement though the organisation.</td>
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<tr>
<td>Complete key work for our 2019 Reconciliation Action Plan, including reviewing opportunities for enhancing our reconciliation commitment.</td>
<td>Achieved</td>
<td>We completed our first Innovate Reconciliation Action Plan (RAP) in this reporting period. Our RAP included 61 actions spread across 16 focus areas. We have completed 58 activities and have agreed with Reconciliation Australia (RA) to roll forward the last three commitments into our next RAP cycle. We have worked closely with RA on the development of our next Innovate RAP for FY20-22.</td>
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<tr>
<td>Undertake Retail Town Centre accessibility audits in FY19 in at least six additional retail town centres to assess the level of accessibility and amenity across the Retail Town Centre portfolio.</td>
<td>Not achieved</td>
<td>Accessibility assessments were completed in five new locations including Burleigh Heads and Bundaberg (Qld), Wendouree and Point Cook (Vic) and Shellharbour (NSW).</td>
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<tr>
<td>Build at least six new inclusive playspaces across our retail town centres and residential communities in FY19.</td>
<td>In progress</td>
<td>Four new inclusive playspaces were completed during FY19 including Elara (NSW) and Newport (Qld) Residential projects, and Stockland Burleigh Heads (Qld) and Birtinya (Qld) Retail Town Centres, with several other playspaces on hold to align with a broader placemaking review of the Retail Town Centre portfolio. The outcomes of the placemaking strategy review will inform the design and delivery of all future playspaces as part of a holistic customer experience improvement project.</td>
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<tr>
<td>Develop a learning module in collaboration with our builder partners to support Livable Housing Australia (LHA) across our Residential developments.</td>
<td>Achieved</td>
<td>The LHA learning module was delivered on the Supply Chain Sustainability School website and is embedded in our Sustainability Schedule for completion by our Contractors operating at our Residential communities.</td>
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<tr>
<td>Develop a communication and education program to engage customers and residents on the nature and benefits of LHA designs and accessibility, using Sustainable Drive at Highlands as a pilot.</td>
<td>Achieved</td>
<td>We produced an education flyer for customers which is available online.</td>
</tr>
<tr>
<td>Work towards a minimum LHA Silver standard (Design certified) for 20 per cent of our Townhomes and Completed Homes by FY20.</td>
<td>In progress</td>
<td>Overall, we delivered 18 per cent silver level Design Certified LHA homes across our residential built form projects.</td>
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FY19 PRIORITIES | STATUS | FY19 PROGRESS
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Work towards a minimum LHA Silver standard (design certified) for 100 per cent of all new retirement living developments by FY20. | In progress | All new retirement living developments active in FY19 are designed to be 100 per cent compliant with LHA Silver design standards as a minimum.
Deliver a minimum of two new display homes in all new residential communities to LHA Silver standard by FY20. | In progress | Six of our residential communities in development during the reporting period have display villages with two or more homes designed to silver level LHA standards, including Altrove (NSW), Aura (Qld), Mt Atkinson (Vic), North Shore (Qld), Minta (Vic), and Willowdale (NSW).
Offer LHA design options from at least two builders in all new residential communities by FY20. | In progress | Builders offer LHA design options at nine of our residential communities in development during the reporting period, including Altrove (NSW), Aura (Qld), Mt Atkinson (Vic), North Shore (Qld), Minta (Vic), and Willowdale (NSW), Vale (WA), Calleya (WA), and Elara (NSW).
Increase our score on the Australian Workplace Equality Index by continuing to enhance LGBTI+ inclusion in our workplace. | Achieved | Completed 2019 AWEI survey and achieved 94/200, a 194 per cent increase on FY18 (32/200).

Future priorities

- Develop Modern Slavery Act (MSA) Statement and continue to work with our supply chain to progress our group-wide response to MSA.
- Implement outcomes of organisational culture review, with an integrated program of work across systems, capability, leadership, processes and structure.
- Commence implementation of our next Innovate Reconciliation Action Plan (FY20-22).
- Further develop an indigenous employment program on the Sunshine Coast in FY20 in partnership with the Australian Retailers Association and Government to facilitate indigenous employment at our new shopping centres in Baringa and Birtinya.
- Continue to target construction of six new inclusive play spaces across our residential and retail portfolio each year
- Collate actions and recommendations from our Retail Town Centre accessibility assessments and commence planning for improvements to customer amenity and risk mitigation.
- Conduct accessibility assessment at an additional four Retail Town Centres to ensure our centres meet the needs of shoppers of all abilities.
- Work towards a minimum LHA Silver standard (Design certified) for 20 per cent of our Townhomes and Completed Homes by FY20.
- Deliver a minimum of two new display homes in all new residential communities to LHA Silver standard by FY20.
- Offer LHA design options from at least two builders in all new residential communities by FY20.

FY19 performance and case studies

Corporate human rights

We have continued activities focused on our human rights approach, including consideration of emerging legislation on modern slavery. We have participated in industry awareness sessions with the Property Council and Green Building Council, as well as industry forums to help develop industry approaches to tackle these issues.

Additionally, our review on key issues for our workforce led to the creation of a LGBTI+ Employee Advocacy Group (lesbian, gay, bisexual, transgender, intersex and other diverse sexual orientations and gender identities). The Group's purpose is to promote LGBTI+ inclusion in the workplace, provide advice to staff on LGBTI+ issues as required, and enhance Stockland's position as employer of choice. In FY19 the Group benchmarked our inclusion efforts by making a submission to the Australian Workplace Equality Index, increasing our Australian Workplace Equality Index Score to 94/200 (a 194% improvement from FY18). This is further described in the Employee Engagement, Development Diversity and Inclusion Deep Dive.
In FY18, we completed a human rights issues review that extended to 100 per cent of our operations. It leveraged external expertise to benchmark the rights articulated in our Human Rights Policy against human rights issues facing the property sector. The review highlighted risks and opportunities based on a review of key documents and interviews with our staff who control frameworks for human rights through their work in governance, risk, sustainability and procurement.

The review identified 11 risk or opportunity areas, and validated supply chain as the highest human rights risk for our business. In response to this, we focused on addressing this area in FY19, with activities such as:

- Developed an industry supply chain survey tool in partnership with 15 member groups of the Property Council of Australia to strengthen property industry approach to human rights and other environmental, social, and governance considerations within the supply chain.
- Continued work on our policy “What Stockland Expects form its Suppliers”, with an aim to launch in FY20. This policy works to align Stockland’s values with those of our suppliers and address human rights issues such as modern slavery.

Reconciliation

We completed our first Innovate Reconciliation Action Plan (RAP) in this reporting period. Our RAP included 61 actions spread across 16 focus areas. We have completed 58 activities and have agreed with Reconciliation Australia (RA) to roll forward the last 3 commitments into our next RAP cycle. We have worked closely with RA on the development of our next Innovate RAP for FY20-22. Our activities over the past year have focused on programs and initiatives that focus on the areas of health and wellbeing, education and community connection to help shape thriving communities that respect, value and celebrate Australia's First Peoples. Some of our key achievements include:

- Partnering with the Australian Business Community Network (ABCN) to sponsor six indigenous scholarships for high school students and to pair them with Stockland mentors. We have committed to providing a further two scholarships which will be announced at the end of 2019.
- Working with Career Trackers to commence indigenous internships for two students in FY19. Career Trackers is an organisation which provides a meaningful change both from an education and employment perspective for Aboriginal and Torres Strait Islander students, with 90% of participants securing ongoing employment through a Career Trackers partner.
- Partnering with Workstars, an indigenous recruitment partner focused in South East to Central Queensland, targeting opportunities at our assets and facilitated through our in-house recruitment provider Careers@Stockland. The program supports successful placements by providing post placement support, such as mentorships for new hires to support settling in.
- Partnering with National Centre of Indigenous Excellence to develop an indigenous temporary workforce to assist in catering and boardroom dining.
- Procurement activities have utilised over $3.6 million from Indigenous suppliers since 2014.
- Delivery of Jamie’s Ministry of Food indigenous cooking program as part of our Queensland mobile kitchen partnership.
- In partnership with the Australian Retail Association and through the adoption of their training program we created employment activity for indigenous only applicants. This continues to bolster our project-level RAP’s at our retail town centre developments on Queensland’s Sunshine Coast and aims to provide a benefit to the local indigenous community through arts and culture, employment and storytelling.
- Implemented a Cultural Awareness training module within the Stockland online training environment. Face to face cultural awareness training was also completed in Queensland at our Sunshine Coast office.
- Implemented all policy and framework requirements of the Innovate Reconciliation Action Plan. This includes review of key organisational policies, creation of a Welcome to Country policy, and the implementation of an employment strategy.
- Completed Reconciliation Plaques at all Stockland branded Retail assets (except for assets where traditional ownership is still in the process of being determined).
- Advocacy and customer communications for NAIDOC and National Reconciliation Week. A Stockland employee who was also an indigenous artist created a national colouring in competition. Additionally, this employee toured Stockland offices to raise awareness for reconciliation.
CASE STUDY

Reconciliation in action on the Sunshine Coast

Stockland is proud to have an ongoing commitment to reconciliation, currently working towards our second ‘Innovate’ Reconciliation Action Plan (RAP), endorsed by Reconciliation Australia. Our activities over the past year have focused on programs and initiatives in the areas of health and wellbeing, education and community connection.

In FY19, Stockland took the initiative to develop a ‘Project RAP’ for two Green Star-registered Retail Town Centre developments on the Sunshine Coast, Baringa and Birtinya. There was a synergy in that the two projects were in the same region and in construction in parallel, and that we were already in consultation with the local Aboriginal community (Kabi Kabi) on activities in our Aura Master Planned Community. The Project RAP provided further opportunity to work with the Kabi Kabi to develop initiatives that would benefit their community at both a project and community level.

Utilising existing relationships established with local Kabi Kabi stakeholders and Native Title applicants, we engaged an Aboriginal-owned consultancy, Balarinji, to help facilitate authentic engagement around culture, art, employment, skills, storytelling and identity. We conducted workshops and meetings to consult and develop a range of initiatives that aligned to Kabi Kabi interests and needs.

Key initiatives undertaken as part of the Project RAP included:
- Engagement and ideas generation workshops;
- Retail Ready – a five week Retail Skills Program for Indigenous participants;
- Retailer Welcome Pack Gift, including design by local Kabi Kabi artist;
- Cultural Awareness Training held with Stockland project team;
- Kabi Kabi Acknowledgement/Welcome Ceremony held at centre opening event; and
- RAP Plaque installed in the centre public mall space.

Once both projects are complete, we will seek to pursue other initiatives, such as using the centre as an arts exhibition or cultural performance space.

With the development of our next Innovate RAP for FY20-22 underway, we look to continue our reconciliation focus on initiatives regarding health and wellbeing, education and community connection to help shape thriving communities that respect, value and celebrate Australia’s First Peoples.

The Gubbi Gubbi Dance Troupe at the official opening ceremony of Stockland Birtinya.
Accessibility and inclusion

Our Accessibility and Inclusion Strategy was developed to respond to the needs of people living with disabilities within and across our communities and to further integrate standards (such as those published by Livable Housing Australia and Changing Places) across our portfolio of assets.

Commercial Property

We remain focused on accessibility in our Commercial Property portfolio, and over the past year we further developed and utilised the accessibility scorecard piloted in FY18. Accessibility assessments were completed in five new locations including Burleigh Heads and Bundaberg (Qld), Wendouree and Point Cook (Vic) and Shellharbour (NSW).

A key initiative in FY19 was the installation of ‘BindiMaps’, an app based wayfinding system for people who live with vision impairment using beacon technology. This is the first time BindiMaps has been deployed in a large footprint building so it is a first for Stockland and for retail assets in Australia. BindiMaps is an empowering technology that allows people with vision impairment to independently navigate a shopping centre environment. This pilot is a key initiative aligned to our accessibility strategy aimed at delivering a better customer experience for people who live with disability. The secondary benefit is that Stockland now has a customer wayfinding system able to be used by anyone to help navigate our Retail Town Centres.

Communities

Within our Communities businesses, we delivered inclusive playspaces at our Newport (Qld) and Elara (NSW) residential communities and in partnership with our community partner Variety, ran an “Inclusivity” workshop to continue to educate our teams involved in designing and delivering communities.

21 of our Stockland designed Residential and Retirement Living built form product are certified Silver Level design standard. During FY19 we delivered 18 per cent of our residential built form product to Silver level LHA design standards, and six of our display villages include LHA silver level display homes, enabling customers to choose from a range of accessible homes. We have piloted a number of innovative options during the year, for example at Cloverton (Vic), builders seeking to operate from our display village were offered financial incentives to deliver LHA designed homes in the village. We will review this project to understand the effectiveness of the incentive during FY20.

Collective bargaining

We support the right to exercise freedom of association and collective bargaining and are not aware of any operations or suppliers in which these rights are at risk. In FY19, approximately five per cent of our employees were covered by collective bargaining agreements. These agreements contain provisions for health and safety protections during dispute and/or grievance processes and in some cases contain commitments to maintain safe and healthy work environments. More broadly, our Work Health and Safety Policy applies to all employees which provides commitments to a safe and healthy work environment.

Corporate policies breaches and grievances

We monitor compliance with corporate policies and report any breaches, as outlined below:

- **employee conduct** – there were 11 substantiated breaches of our Code of Conduct in FY19 involving inappropriate behaviours in the workplace resulting in three terminations of employment, six formal warnings and two performance/expectations conversations.
- **fraud and corruption** – there were no substantiated breaches of our Fraud and Corruption Policy in FY19.
- **discrimination** – there were no substantiated incidents of discrimination in FY19.3
- **privacy** – there were no notifiable data breaches identified in FY19.
- **grievances** – there were three formal grievances raised which were considered and resolved following discussions.
- **whistleblower** - There was one concern raised by a whistleblower on a confidential basis to one of our Whistleblower Protection Officers in late FY18. This matter was investigated and closed during FY19. We also received three further anonymous concerns raised via our whistleblower channel on Stockland’s website and our internal “Ask Mark” channel. These matters were investigated and closed, with the appropriate actions taken. Two of the matters resulted in action as summarised in the employee conduct section above.

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3 This includes incidents involving the rights of indigenous people.