

Responsible Investment Policy

Scope

Investa is an Australian-domiciled, leading, investment manager of commercial and residential real estate with an integrated property platform incorporating investment management, asset, development and property management services.

The Responsible Investment Policy (**Policy**) applies to Investa Management Holdings Pty Limited (**IMH**) and its subsidiaries (together, **Investa**). Investa Management Pty Limited (**IM**) is a wholly owned subsidiary of IMH and is the primary employing entity in the Investa business.

The Policy provides Investa's overarching framework for responsible investment. The Policy is principles-based, non-prescriptive and non-retrospective. The Policy does not explicitly outline the detailed processes for investment, but rather, provides guiding principles for responsible investment.

The Investa investment management business comprises the funds and mandates managed by Investa on behalf of its owners (together the **Entities**). The Entities develop their own investment approaches and performance benchmarks in line with their individual governance bodies and investor expectations. Specific requirements of an Entity may exist and be referred to in that Entity's constituent documents or policy. This policy is to be read in conjunction with those documents and to the extent of any inconsistency, the Entity's constituent documents or policy will prevail.

Objective

The objective of this Policy is to complement financial returns by outlining Investa's approach to integrating responsible, sustainable and ethical considerations into investment decision-making and stewardship processes, in line with our vision and strategy to generate positive social and environmental impact and a resilient business.

Key Principles

At Investa, we strive to build a business that delivers investment and real estate asset management performance and positive social and environmental impact. Assessing and managing environmental, social and governance (**ESG**) risks and opportunities in our investment decision-making and stewardship processes is consistent with this goal and our fiduciary duties as an investment manager.

Investa's approach to responsible investment aligns with the six principles established by the Principles for Responsible Investment (PRI) being:

1. Including ESG factors into investment analysis and decision-making processes.
2. Incorporating ESG factors into our management and ownership policies and practices.
3. Seeking appropriate disclosure on ESG factors for our investment entities.
4. Promoting acceptance and implementation of the principles within the investment industry.
5. Working together to enhance our effectiveness in implementing the principles.
6. Reporting on our activities and progress towards implementing the principles.

Investa's approach also seeks to align with the ambitions of the United Nations' Sustainable Development Goals (SDG's) to create positive actions to make a difference at a global scale. Investa's priority areas for creating positive impact include:

- Good health and wellbeing (SDG 3) through certifications and initiatives that support and engage with employees and communities in our buildings on health and wellbeing

- Sustainable cities and communities (SDG 11) through our climate and nature, and thriving communities' strategies
- Climate action (SDG 13): through our climate and nature strategy, which works towards reducing emissions, and our employee and customer engagement on climate conscious behaviour.

Responsible investment focus areas

In line with Investa's corporate strategy, 'Driving the Future of Real Estate', the focus of the Policy is to create shared value through innovative, tailored solutions for today and tomorrow, by transforming real estate through ESG. The following ESG focus areas are considered in Investa's responsible investment practices, as follows:

Environment - Sustainable Buildings	Social - Thriving Communities	Governance - Resilient Business
Climate strategy	Health, safety and wellbeing	Ethical governance and standards
Energy and water efficiency	Community	Transparent disclosure
Nature	First Nations Peoples	Human rights and modern slavery
	Diversity and inclusion	

The application of the three ESG pillars to our investment management approach, where appropriate, is outlined below

Environment – Sustainable Buildings

- Applying the Investa *climate strategy* to:
 - Identify, assess and address climate change risks (physical and transition) and incorporate adaptation measures into our investment and operational approach; and
 - Identify and achieve net zero carbon goals in the transition to a low carbon economy.
- *Energy and water efficiency* -
 - Investing in assets with high sustainability ratings, or those with the ability to enhance their sustainability performance.
 - Undertaking responsible management of resources through optimal operation of our buildings, improving energy and water efficiency.
- *Nature* - Addressing impacts and dependencies on nature and promoting nature positive outcomes.

Social – Thriving Communities

- *Health, safety and wellbeing* – Implementing management practices that protect and enhance our employees, customers and communities.
- *Community* –
 - Investing in assets and initiatives that contribute to local communities, employment, social and wellbeing.
 - Engaging with customers and communities to build their knowledge in ESG, create positive change and influence adoption of ESG practices.
- *First Nations Peoples* - Supporting First Nations Peoples and communities, through asset investments and procurement initiatives in line with our Innovate Reconciliation Action Plan.
- *Diversity and inclusion* - Supporting management practices that protect and enhance the diversity and inclusion of our employees, customers, and communities.
- *Human rights and modern slavery* -
 - Collaborating with managers, partners and suppliers, investors, and customers to minimise supply chain risk.
 - Assessing and minimising human rights and modern slavery impacts in our investment and management supply chains.

Governance – Resilient Business

- *Ethical governance and standards* –
 - Adhering to ethical, legal and professional standards in the management of Investa's entities.
 - Adhering to this Policy.
- *Transparent disclosure* –
 - Reporting on the ESG performance of Investa's entities in accordance with mandatory/regulatory requirements and voluntary frameworks.

Performance principles, standards and guidelines

We will adopt, where appropriate, at a management platform or entity level, industry best practice ESG performance principles, standards and guidelines, including, but not limited to, the following:

- Principles of Responsible Investment (PRI)
- UN SDG's
- Taskforce on Climate-Related Financial Disclosure (TCFD)
- Taskforce on Nature-Related Financial Disclosures (TNFD)
- United Nations Guidelines Principles on Business and Human Rights
- Green Loan Principles, Sustainable and Sustainability Linked Loan Principles, Social Loan Principles and the Climate Bond Initiative
- World Green Building Council's Net Zero Carbon Building Commitment

Investment in real assets will seek to achieve ratings that include, but are not limited to, the following certification schemes:

- The National Australian Built Environment Rating System (NABERS) or Nationwide Housing Energy Rating Scheme (NatHERS)
- WELL Building Standard
- Green Building Council of Australia Green Star
- Climate Bond Initiative Standard.

Investment decision-making

In keeping with our fiduciary duties and our requirements as signatory to the PRI, we consider ESG risks and opportunities, where appropriate, in the following ways:

Regulation

We will meet our own legal and regulatory requirements and engage and work with our investors, customers, business partners and employees to assist them to understand the impact of their actions on the environment and wider community and their own legal requirements. As a principle, we will endeavour to go beyond compliance and encourage our investors and business partners to do the same.

Integration

We will assess ESG impacts (positive and negative) in the various stages of our investment decision-making, including:

- Capital raising and investor due diligence.
- Asset design, construction and facilities management
- Tenancy due diligence, contracting and management
- Asset acquisition, retention, and disposal
- Building upgrades and maintenance.

Stewardship

We will deliver and maintain sustainable buildings and encourage our customers and business partners to adopt leading, sustainable business practices.

Collaboration

We will work together with a range of industry partners to promote and enhance the integration of ESG into investment decision-making and stewardship activities.

Reporting

We will monitor and report on progress with implementing the requirements of this Policy in our annual ESG reporting and in our annual PRI reporting.

Who we do business with

Our preference is to do business with investors, customers and business partners that are aligned with the ESG principles and focus areas outlined in this Policy.

Through our role as an investment and asset manager, we will work with our investors, customers and suppliers to support them in delivering these focus areas.

Associated policies and protocols

This Policy is integral to Investa's broader governance structures and complimentary to other Investa policies and charters, including, but not limited to:

- Sustainability Policy
- Environment Policy
- Risk Management Policy
- Code of Conduct
- Diversity and Inclusion Policy
- Whistleblower Policy
- Equal Employment Opportunity Policy
- Human Rights Policy
- Supplier Code of Conduct
- Work Health and Safety Policy

Policy Framework Review

The Policy will be reviewed by Investa annually.

Policy Information

Responsibility: General Manager, Corporate Sustainability & COO

Date Created: 20 March 2007

Date Last Reviewed: 19 August 2024

Revision History:

Version	Date Released	Document Title	Accountable	Description
1.0	20 March 2007	Investa Sustainable Responsible Investment Guidelines	General Manager Corporate Sustainability	
2.0	23 May 2012	Investa Sustainable Responsible Investment Guidelines	General Manager Corporate Sustainability	Updates to entities, principles and commitments
2.0	13 December 2017	Investa Sustainable Responsible Investment Guidelines	General Manager Corporate Sustainability	Updates to principles and commitments
3.0	18 October 2024	Responsible Investment Policy	General Manager, Corporate Sustainability, Head of Environment & COO	Updates to principles and commitments