

# Human Rights Policy

## Scope

This policy framework applies to Investa Management Holdings Limited (**IMH**) and its subsidiaries (together, **Investa**). The policy framework provides the overarching framework for the process regarding human rights risk management by Investa, including in the management of the Investa funds business, which comprises the funds, or mandates managed by Investa on behalf of external investors.

Investa recognises that all human beings are born free and equal in dignity and rights. This Human Rights Policy reaffirms Investa's commitment to respect human rights. It provides a basis for embedding our responsibility to respect human rights across Investa's operations and influencing positive outcomes through our business relationships.

This policy applies to Investa's employees and contractors.

## Key Principles

Investa is proud of our history of advocating for an inclusive, equitable society across a wide range of social issues. Human rights are fundamental to our commitment to being open and ethical in our dealings and vital to our vision to create Australia's most valued workplaces and communities.

We understand that our investments, operations, developments and business relationships may have an impact (both positive and negative) on a range of stakeholders. We are committed to embedding respect for human rights into our risk management and operational practices; and supporting our employees, customers, and suppliers, as well as the communities in which we operate.

## Our Commitment and Approach

We commit to respecting all human rights as set out in the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights and ILO Declaration on Fundamental Principles and Rights at Work. Our approach is guided by the UN Guiding Principles on Business and Human Rights.

We implement this commitment by:

- Complying with applicable laws wherever we operate. Where national and international standards differ from our human rights commitments, we will strive to follow the higher standard; where they conflict we will respect human rights to the highest standard possible.
- Striving to provide safe workplaces and facilities, and a safe, healthy, respectful and productive workplace environment free from discrimination, harassment, sexual harassment, vilification, victimisation, bullying and unfair treatment in all of its forms.
- Respecting our employee's rights to freedom of association and collective bargaining.
- Working towards ensuring no modern slavery in our operations and supply chain.
- Where modern slavery or human rights issues are identified in our supply chain, we seek to work with our suppliers and stakeholders and utilise our business relationships to mitigate negative impacts and enhance positive ones in line with human rights standards.
- Encouraging our suppliers to develop appropriate responses to their modern slavery and human rights risks.
- Acknowledging the links between environmental and human rights impacts, and by integrating environmentally responsible practices throughout the organisation.

- Not tolerating retaliation against complainants, advocates or defenders of human rights seeking to protect rights and fundamental freedoms on behalf of others.

We will undertake human rights due diligence to identify, assess and address our human rights impacts, and seek to engage with stakeholders to help us continue strengthening our approach.

Investa will communicate this policy to our employees and provide training to enhance their understanding of this policy and their ability to operationalise our human rights commitments.

We provide a grievance mechanism to allow stakeholders to raise concerns with us, including in relation to human rights. Where we identify that we have caused or contributed to a human rights harm, we will work to assist and cooperate in its remediation (including utilising our business relationships).

We seek to track the effectiveness of our human rights approach, and we communicate publicly on our human rights approach in our annual sustainability reports and modern slavery statements.

### **Third parties and collaboration**

We seek to work with suppliers and other third parties who respect human rights. We communicate our human rights expectations to suppliers through our Supplier Code of Conduct and the Responsible Investment Policy.

We collaborate with industry partners, suppliers, and service providers on further enhancing our approach to human rights risk management.

### **Roles and Responsibilities**

The Audit & Risk Committee (IMH ARC) a sub-committee of the Investa Management Holdings Pty Ltd (IMH) Board, guides the implementation, operation and effectiveness of Investa's human rights approach.

In consultation with our Directors and Group Executive, the General Manager Corporate Sustainability has overall responsibility for the direction of Investa's human rights approach.

### **Associated Policies and Protocols:**

This Policy is part of the Investa Governance policy suite and is complimentary to other Investa policies and charters, including, but not limited to:

- Code of Conduct
- Whistleblower Policy
- Diversity and Inclusion Policy
- Equal Employment Opportunity Policy
- Supplier Code of Conduct
- Sustainability Policy
- Work Health and Safety Policy

These policies can all be found on the Investa website under Governance.

## Policy Information

### Policy Framework Review

This framework will be reviewed by Investa annually.

### Policy Framework Information

**Responsibility:** General Manager, Corporate Sustainability and Chief Operating Officer, Real Estate

**Date Last Reviewed:** 18 October  
2024

**Review Frequency:** Annually

#### Revision History:

Version	Date Released	Accountable	Description
1.0	6 May 2021	General Manager, Corporate Sustainability & COO	Policy framework
2.0	28 June 2023	General Manager, Corporate Sustainability & COO	Updates to policy framework, principles and commitments
3.0	18 October 2024	General Manager, Corporate Sustainability & COO	Updates to policy framework