



QUALITAS

Sustainable Finance Framework

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Acknowledgement of Country

Qualitas acknowledges the Traditional Custodians of Country throughout Australia and their ongoing connection to land, sea and community. We pay our respect to their Elders past and present.



1 Purpose

The Qualitas Sustainable Finance Framework (“Framework”) outlines the basis on which Qualitas may undertake certain types of sustainable finance transactions on its own behalf and on behalf of funds and investment vehicles we manage. The types of sustainable finance transactions covered by this framework include:

1. Green Loans
2. Social Loans
3. Sustainability-Linked Loans

2 Qualitas’ approach to Responsible Investment

Qualitas Limited is an ASX-listed Australian alternative investment manager with A\$10.9 billion¹ of committed funds under management. We match global capital with access to attractive risk-adjusted investments in real estate private credit and real estate private equity through a range of investment solutions for institutional, wholesale and retail clients. We offer flexible capital solutions for our partners, creating long-term value for shareholders, and the communities in which we operate.

Since 2008 Qualitas has been investing through market cycles to finance assets with a combined value of over A\$34 billion² across all real estate sectors. Our focus is on real estate private credit, opportunistic real estate private equity, income producing commercial real estate and build-to-rent residential.

Across our business and investment activities environmental, social and governance (“ESG”) considerations are a core priority, shaping both how we operate as a company and how we assess and manage risk and identify opportunities in our investment platform.

We believe the integration of ESG leads to better performance and more sustainable growth for our business, our partners and our investors.

Qualitas has been a signatory to the United Nations supported Principles for Responsible Investment (UNPRI) since 2021 and we are committed to implementing its six principles. Our vision for ESG includes leveraging our leading real estate private markets platform to help Australian real estate owners and developers transition to a more sustainable future.

3 About the Framework

Qualitas has developed the Framework to help us identify and appropriately classify investments and transactions that contribute to positive sustainability outcomes and that align with our Responsible Investment ESG Policy and objectives.

The Framework sets out how we intend to assess, measure, monitor and report on sustainable finance transactions across our funds management platform. The Framework also serves as a guide for the issuance of sustainable finance instruments (where Qualitas or our funds are borrowers) and for the development of green and social themed funds and products which Qualitas may offer to investors from time to time. Such funds and products may reference this Framework.

¹ As at 31 December 2025

² As at 30 June 2025

We have sought to align the Framework with the relevant Asia Pacific Loan Market Association (“APLMA”) Loan Principles (“Market Standards”), specifically:

1. Green Loans – APLMA Green Loan Principles (“GLP 2025”)
2. Social Loans – APLMA Social Loan Principles (“SLP 2025”)
3. Sustainability-Linked Loans – APLMA Sustainability-Linked Loan Principles (“SLLP 2025”)

GLP 2025, SLP 2025 and SLLP 2025 are the market standard guidelines for sustainable debt transactions in the Asia Pacific region. Where appropriate, we have also considered the Australian Sustainable Finance Taxonomy Version 1 2025 Technical Screening Criteria and the NABERS Sustainable Finance Criteria Version 2.0 2025 in determining eligibility criteria under the Framework.

4 Green Loans

Green Loans are any type of credit instrument made available exclusively to finance or re-finance, in whole or in part, new and/or existing projects within the following Eligible Green Categories as they relate to residential and commercial real estate:





1. Green Buildings
2. Energy Efficiency
3. Clean Transportation
4. Sustainable Water
5. Waste Management

Green Loans extended or issued under this Framework will align with the four core elements of the GLP 2025, being:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting





4.1 Use of Proceeds








Proceeds of a Green Loan will be used exclusively by the borrower for an Eligible Green Purpose. Details of what qualifies as an Eligible Green Purpose for Green Loans under this framework are set out in the following table together with their alignment to the United Nations Sustainable Development Goals (“SDGs”).

Eligible Green Category	Eligible Green Purpose	Green Eligibility Criteria
<p>Green Buildings</p> <p>Aligned to SDGs</p>    	<p>Finance for the construction, purchase or re-finance of new or existing residential or commercial buildings that satisfies the Green Eligibility Criteria.</p>	<p>Residential Buildings³</p> <ul style="list-style-type: none"> Green Building Council of Australia (“GBCA”) Green Star Buildings ≥ 5 star <p>OR</p> <p>All of the following:</p> <ul style="list-style-type: none"> Nationwide House Energy Rating Scheme (NatHERS) average rating ≥ 7.5 star (minimum rating ≥ 6 star) Fully electrified (no fossil fuel sources) Energy efficient lighting and lifts as required under Section J of the National Construction Code (NCC) 2022 MEPS appliance ratings in accordance with Section J of the NCC⁴ Installed PV Solar optimised for available roof space $\geq 10\%$ of car parks with electric vehicle (“EV”) chargers at completion (and infrastructure for 100%) Together, the above criteria can be used to demonstrate the building(s) can be within the top 15% of buildings in emissions performance in the location. <p>Office Buildings</p> <ul style="list-style-type: none"> GBCA Green Star Buildings ≥ 5 star <p>OR</p> <ul style="list-style-type: none"> NABERS Energy rating ≥ 5.5 star <p>Industrial Buildings (including warehouses and cold stores)</p> <ul style="list-style-type: none"> GBCA Green Star Buildings ≥ 4 star <p>OR</p> <ul style="list-style-type: none"> NABERS Energy rating ≥ 5 star

³ Includes Class 2 buildings as defined under the National Construction Code (NCC). Where finance relates to one or more sole occupancy units within a strata (e.g. Residual Stock Loans) criteria applies to the whole building.

⁴ MEPS (Minimum Energy Performance Standards) is an energy rating label used in Australia to rate the energy efficiency of household appliances such as air conditioners, washing machines, clothes dryers, fridges, freezers, televisions and pool pumps.

		<p>Retail Buildings (including shopping centres)</p> <ul style="list-style-type: none"> • GBCA Green Star Buildings ≥ 4 star OR • NABERS Energy rating ≥ 5.5 star <p>All Other Non-Residential Buildings</p> <ul style="list-style-type: none"> • GBCA Green Star Buildings ≥ 4 star OR • NABERS Energy rating ≥ 5 star
<p>Energy Efficiency</p> <p>Aligned to SDGs</p>    	<p>Finance for the upgrade or refurbishment of existing commercial buildings that satisfies the Green Eligibility Criteria</p>	<p>Capital expenditure for any of the following building upgrades/modifications:</p> <ul style="list-style-type: none"> • Installation of energy efficient lighting • Upgrades to energy efficient HVAC and mechanical systems • Improvements to the thermal performance of the building (e.g. glazing, insulation) • Electrification – removal of fossil fuel energy sources and replacement with electric • Installation of PV solar and/or battery energy storage systems <p>Provided that such upgrades/modifications will result in at least a 1-star improvement in the NABERS Energy rating, subject to:</p> <ul style="list-style-type: none"> • Achieving a minimum NABERS Energy rating of 4-stars for buildings with a starting NABERS rating of ≤ 2.5; • Achieving a minimum NABERS Energy rating of 4.5 stars for buildings with a starting NABERS rating of ≥ 3.0.
<p>Clean Transportation</p> <p>Aligned to SDGs</p>	<p>Finance for capital expenditures on existing buildings that satisfies the Green Eligibility Criteria</p>	<p>Capital expenditures for any of the following building upgrades/modifications:</p> <ul style="list-style-type: none"> • Installation and maintenance of electric vehicle (“EV”) charging stations: <ul style="list-style-type: none"> ○ For non-residential buildings, a minimum of

  		<p>20% of available parking spaces</p> <ul style="list-style-type: none"> ○ For residential buildings, a minimum of 10% of available parking spaces, with infrastructure sufficient for 100% ● Installation and maintenance of bicycle storage and related end-of-trip facilities: <ul style="list-style-type: none"> ○ For non-residential buildings, bicycle spaces for a minimum of 10% of building occupants ○ For residential buildings, a minimum of 1 bicycle space per dwelling
<p>Sustainable Water</p> <p>Aligned to SDGs</p>  	<p>Finance for capital expenditures on existing buildings that satisfies the Green Eligibility Criteria</p>	<p>Capital expenditure for building upgrades/modifications designed to improve water use efficiency of the building provided that such upgrades/modifications will result in at least a 1-star improvement in the NABERS Water rating (subject to achieving a minimum NABERS Water rating of 4-stars).</p>
<p>Waste Management</p> <p>Aligned to SDGs</p>  	<p>Finance for capital expenditures on existing buildings that satisfies the Green Eligibility Criteria</p>	<p>Capital expenditure for building upgrades/modifications designed to improve waste management and reduction of waste provided that such upgrades/modifications will result in at least a 1-star improvement in the NABERS Waste rating (subject to achieving a minimum NABERS Waste rating of 4-stars).</p>

4.2 Process for Project Evaluation and Selection

Qualitas' Head of ESG (or their equivalent from time to time) will have responsibility for overseeing the implementation of the Framework in consultation with the relevant Qualitas Head of Fund (or their equivalent from time to time) and Qualitas Risk Management Team.

Qualitas Investment Teams will identify potential eligible green projects based on the criteria set out in the *Use of Proceeds* section above.

All potential projects will be reviewed by the Head of ESG and the relevant Head of Fund to confirm:

1. The project meets an Eligible Green Purpose and satisfies the relevant Green Eligibility Criteria; and
2. Appropriate evidence has been provided to verify that the project satisfies the relevant Green Eligibility Criteria⁵.

In addition to being for an Eligible Green Purpose and satisfying the relevant Green Eligibility Criteria, a potential project must comply with Qualitas' Responsible Investment ESG Policy, including any asset or sector exclusions contained in that policy from time to time. The following activities are excluded from financing under this Framework:

- Assets or projects in sectors excluded under [Qualitas' Responsible Investment ESG Policy](#) from time to time; and
- Assets or projects involved in gaming or wagering (casinos, poker machine venues) or extraction, production, distribution or sale of fossil fuels (coal, oil, gas or refined oil products (petrol/diesel)).

Qualitas' Head of ESG will provide an approval confirmation as to Green Loan eligibility to the relevant Fund Investment Committee ("Fund IC"), which has responsibility for approving Green Loans extended under the Framework.

4.3 Management of Proceeds

Proceeds of Green Loans extended in accordance with this Framework may be sourced from any fund or investment vehicle managed by Qualitas or from Qualitas' own funds. Such funds or sources need not have specific ESG objectives or criteria attached to them (although they may have).

Qualitas will maintain an internal Sustainable Finance register⁶ to record all Green Loans across our various managed funds and investment vehicles and match them to the applicable underlying project financed. The total value of underlying projects should always match or exceed the amount of Green Loans recorded.

We will record Green Loans in the Sustainable Finance register based on the total principal commitment of the loan even where from time to time there may be amounts undrawn under a Green Loan (e.g. due to progress draws under a construction loan).

If any underlying project(s) recorded in the Sustainable Finance register no longer satisfy the Green Eligibility Criteria, we will remove them from the register as soon as reasonably practicable after becoming aware of the non-compliance. Qualitas' Head of ESG will be responsible for maintaining the Sustainable Finance register.

⁵ In the case of new buildings undergoing construction for which a relevant building certification may not yet be available, appropriate evidence may include design and planning documentation (such as a sustainability management plan) which outlines target ratings (including the relevant achievement pathway) and/or verification of rating registration or similar.

⁶ The Sustainable Finance register refers to the internal master register managed by the Head of ESG at Qualitas and is separate from the eligible asset register or similar register which may be referred to in specific loan documentation.

4.4 Reporting

The Sustainable Finance register will be included as a standing reporting item for all Qualitas ESG Advisory Group and Board meetings and incorporated into any ESG data and reporting packs we produce from time to time. We will include details of any Green Loans under the Framework within the ESG section of our Annual Report or as part of any standalone Sustainability Report we may publish.

Details of Green Loans will include the aggregate amount of Green Loans outstanding, progress towards meeting any green and sustainable finance targets we may set from time to time and examples and case studies of the types of eligible green projects we are financing.

We may apply a look-back period of not more than 36 months from the date of this Framework for the inclusion of existing Green Loans which satisfy the Eligible Green Purpose and Green Eligibility Criteria in our Sustainable Finance register⁷.

⁷ This may include loans not documented or labelled as green/social loans in accordance with APLMA guidelines, provided it can be demonstrated with reasonable evidence that the project or asset being financed satisfies the relevant eligibility criteria and the proceeds are being used exclusively for that project or asset.

5 Social Loans

Social Loans are any type of credit instrument made available exclusively to finance or re-finance, in whole or in part, new and/or existing projects within the following Eligible Social Categories as they relate to residential and commercial real estate:




1. Affordable Housing
2. Access to essential services

Social Loans extended or issued under this Framework will align with the four core elements of the SLP 2025, being:




1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

5.1 Use of Proceeds

Proceeds of a Social Loan will be used exclusively by the borrower for an Eligible Social Purpose. Details of what qualifies as an Eligible Social Purpose for Social Loans under this Framework are set out in the following table together with their alignment to the United Nations Sustainable Development Goals (“SDGs”). Also included are relevant Key Impact Indicators for how we will report on the social impact of eligible projects.

Eligible Social Category	Eligible Social Purpose	Social Eligibility Criteria
<p>Affordable housing</p> <p>Aligned to SDGs</p>   	<p>Finance for the construction, purchase or re-finance of new or existing residential buildings that satisfies the Social Eligibility Criteria.</p> <p>Key Impact Indicators:</p> <ul style="list-style-type: none"> • Number of social/affordable units delivered • Share of tenants in low income or essential worker categories • Rental cost compared to city median rent 	<ul style="list-style-type: none"> • Residential projects or multi-dwelling buildings that are being or have been developed under Government-led (state or federal) programs to increase the supply of social and/or affordable housing where those projects or buildings will continue to be operated under those Government programs during the term of the finance. • Residential projects or multi-dwelling buildings where $\geq 20\%$⁸ of units are provided as affordable housing where: <ul style="list-style-type: none"> ○ rent is $\leq 80\%$ of current market rental rate; and ○ units must be provided as affordable housing for a period of ≥ 8 years.

⁸ Where the proportion of affordable units in a multi-dwelling building is $< 90\%$ of total units but $\geq 20\%$ of units the Social Loan will be apportioned only to the affordable unit component based on the proportion of total units in the development.

<p>Access to essential services</p> <p>Aligned to SDGs</p>   	<p>Finance for the construction, purchase or re-finance of new or existing real estate assets that satisfies the Social Eligibility Criteria.</p> <p>Key Impact Indicators:</p> <ul style="list-style-type: none"> • Number of patient hours served • Number of new beds provided • Number of new facilities constructed or upgraded • Number of students supported • Number of new student places delivered • Number of aged care places supported or delivered • Number of SDA units supported or delivered 	<ul style="list-style-type: none"> • Projects or assets that expand access to the following services: <ul style="list-style-type: none"> ○ Public healthcare (e.g. clinics and healthcare centres providing access to Medicare covered and/or Bulk Billed services) ○ Aged care (e.g. accredited NFP aged care facilities) ○ Education (e.g. early learning centres, public education providers) <p>Provided that $\geq 80\%$ of the income of the project or asset is derived from one or more of these services and continues to be for the term of the finance (there should be no intention for the project or asset to be redeveloped for another purpose).</p> <ul style="list-style-type: none"> • Residential projects or multi-dwelling buildings where $\geq 20\%$⁹ of units are provided as Specialist Disability Accommodation (SDA) by an accredited National Disability Insurance Scheme (NDIS) SDA provider and where the units are enrolled as SDA dwellings.
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5.2 Other SLP 2025 Elements

The other elements of Process for Project Evaluation and Selection, Management of Proceeds and Reporting will be implemented for Social Loans in the same manner as set out in this Framework for Green Loans. For the avoidance of doubt, Social Loans will be recorded in the same Sustainable Finance register as Green Loans and will not be maintained in a separate register.

⁹ Where the proportion of SDA units in a multi-dwelling building is $< 90\%$ of total units but $\geq 20\%$ of units the Social Loan will be apportioned only to the affordable unit component based on the proportion of total units in the development.

6 Sustainability-Linked Loans

Sustainability-Linked Loans (“SLL”) are any type of credit instrument made available to a borrower where the interest margin adjusts depending on whether the borrower achieves (or fails to achieve) certain predetermined sustainability performance objectives.

The proceeds of an SLL may be used for any purpose (other than a purpose that is excluded under our Responsible Investment ESG Policy). The terms of an SLL will include a loan margin adjustment mechanism to incentivise the borrower to achieve agreed ESG Key Performance Indicators (“KPIs”).

Any loan originated across any Qualitas managed fund or investment vehicle may be eligible to be structured as an SLL. Qualitas, or any of its managed funds or investment vehicles may also issue SLLs from time to time to support our ESG goals. SLLs extended or issued by Qualitas under this Framework will align with the core elements of the SLLP 2025, being:

1. Selection of KPIs
2. Calibration of Performance Targets
3. Loan Characteristics
4. Reporting
5. Verification

6.1 Selection of KPIs

The credibility of an SLL depends on the selection of appropriate and credible KPIs. In considering the appropriateness of KPIs they should be:

1. relevant, core and material to the borrower’s overall business
2. of strategic significance to the borrower’s current and/or future operations
3. measurable or quantifiable on a consistent methodological basis
4. able to be benchmarked

Private credit market real estate borrowers can be at varying levels of ESG maturity so KPIs need to be considered in the context of the borrower’s current level of ESG sophistication and their available resources. KPIs may be applied at the borrower level or “downstream” to an asset or group of assets owned by the borrower.

Qualitas has developed a list of appropriate KPIs to select from, which is contained in Appendix 2.

Qualitas Investment Teams will identify borrowers that may benefit from an SLL to support their ESG or sustainability objectives. Investment Teams, with the assistance of the Head of ESG will work with the borrower to select appropriate KPIs from the KPI list in Appendix 2 that will apply to the loan.

Qualitas’ Head of ESG will provide an approval confirmation as to the appropriateness of the KPIs selected to the relevant Fund IC, which has responsibility for approving SLLs extended under this Framework.

6.2 Calibration of Performance Targets

Each KPI should have a measurable Performance Target. The Performance Targets for each KPI should be ambitious and should:

1. Support the borrower to do more than “business as usual” or what is required by regulation
2. Be comparable to a benchmark or external reference
3. Be determined on a pre-defined timeline
4. Be verified

Performance Targets for each KPI will be set in collaboration with the borrower taking into consideration the borrower’s circumstances and resources and the term of the loan. Qualitas’ Head of ESG will provide a verification and sign off as to the appropriateness of the Performance Targets set for each SLL to the relevant Fund IC.

6.3 Loan Characteristics

SLLs will incorporate a margin adjustment that operates both ways. The margin will reduce where a KPI is achieved and increase if the KPI is not achieved within the agreed time frame for achievement.

Margin adjustments will be linked to the level of ambition of the KPI based on the following matrix¹⁰:

KPI Ambition	KPI Achieved					
	YES			NO		
	High	Med	Low	High	Med	Low
KPI 1	-3 bps	-2 bps	-1 bps	+1 bps	+2 bps	+3 bps
KPI 2	-3 bps	-2 bps	-1 bps	+1 bps	+2 bps	+3 bps
KPI 3	-3 bps	-2 bps	-1 bps	+1 bps	+2 bps	+3 bps
	-9 bps	-6 bps	-3 bps	+3 bps	+6 bps	+9 bps

Qualitas Investment Teams will have discretion to set margin adjustments on a case-by-case basis within the above parameters.

Margin adjustments will take place from the interest payment date immediately following verification of achievement (or non-achievement) of a KPI (which will be evidenced via a KPI Confirmation Statement). Where the margin adjustment is an increase due to the borrower failing to achieve a KPI within the agreed time frame Qualitas will, on a best endeavours basis, isolate the incremental returns and contribute those excess returns to our group charity budget.

6.4 Reporting

Borrowers will be required to report on the Performance Targets for each KPI at least once per annum, or more frequently if the time frame for achieving a KPI is less than 1 year. The scope and frequency of reporting will be incorporated within the facility documentation of each SLL. Reporting will be in the form of a KPI Confirmation Statement. The KPI

¹⁰ The margin adjustment matrix is intended to be illustrative only. Margin adjustments will be set on a case-by-case basis having regard the specific transaction requirements.

Confirmation Statement should include details of all calculations and assumptions relating to each KPI and Performance Target.

Borrowers will be encouraged to publicly report information relating to their SLL including the rationale for KPIs and methodology for calculating Performance Targets.

Qualitas will include details of all SLLs extended or issued under this Framework in its Sustainable Finance register, which will be included as a standing reporting item for all Qualitas ESG Advisory Group and Board meetings and incorporated into any ESG data and reporting packs we produce from time to time.

We will include details of SLLs extended or issued under this Framework within the ESG section of our Annual Report or as part of any standalone Sustainability Report we may publish.

Details of SLLs will include the aggregate amounts outstanding, progress towards meeting any green and sustainable finance targets we may set from time to time and examples and case studies of the types of SLL we are making or issuing.

6.5 Verification

Where appropriate and feasible borrowers will be required to provide independent verification of their achievement against Performance Targets for each KPI. Qualitas will determine on a case-by-case basis what form this verification will take based on the nature of the KPI and the data required to be verified (i.e. internal company data or external data). Verification requirements will be incorporated within the facility documentation of each SLL.

Where Qualitas is a borrower, external verification against Sustainability Performance Targets (SPTs) will be sought in relation to any potential sustainability adjustment being applied to the margin, which will be referenced in the specific loan or equivalent documentation.

Qualitas' Head of ESG will review and approve a borrower's KPI Confirmation Statement and the form of verification.

7 Assurance

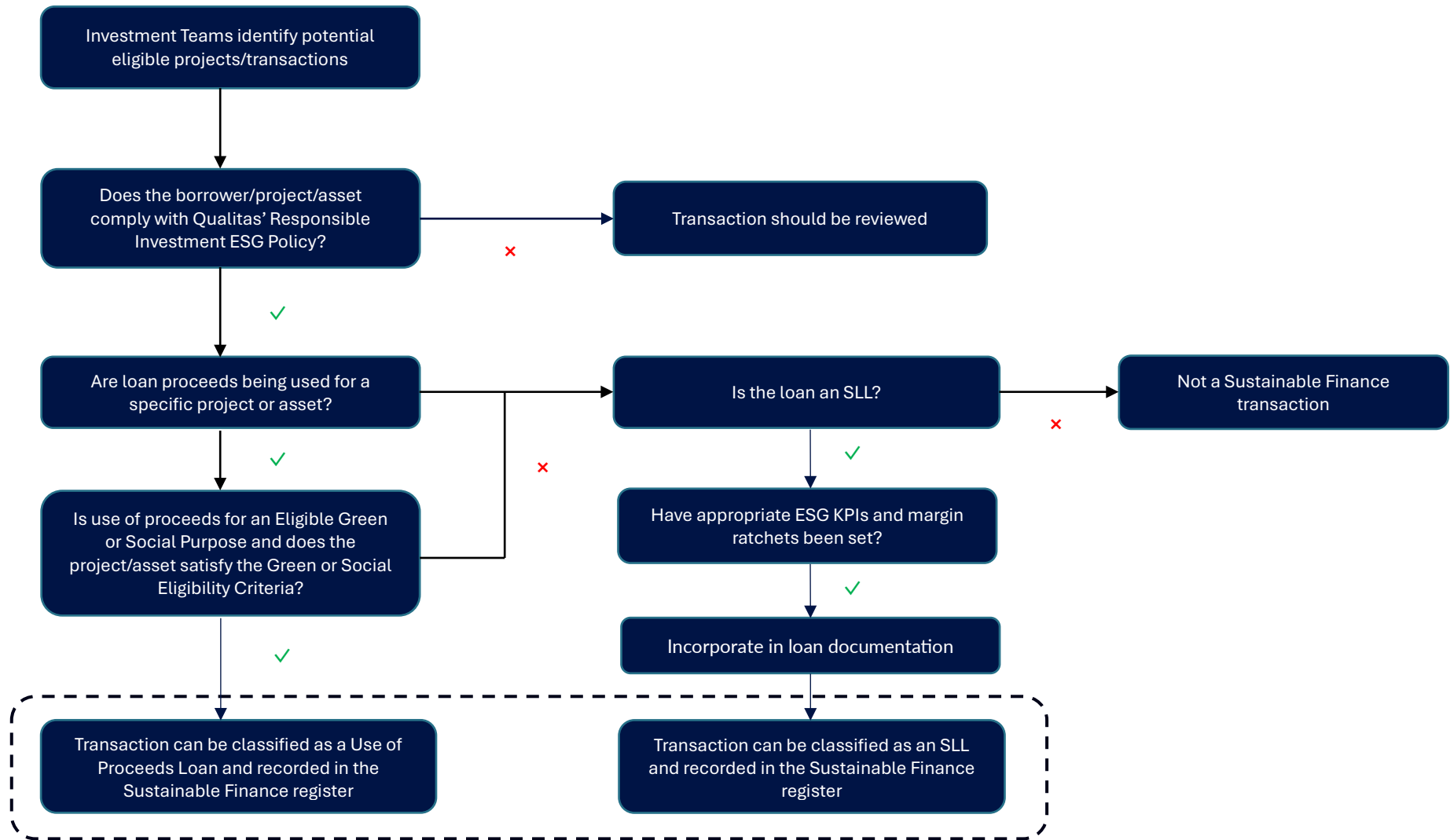
Qualitas will obtain an independent Second Party Opinion ("SPO") and/or Limited Assurance Opinion ("LAO") confirming that this Framework aligns with the current relevant Market Standards and that the eligibility criteria are appropriate and credible.

The Framework will be reviewed periodically and updated as appropriate to ensure it continues to align with current relevant market standards, including but not limited to APLMA Loan Principles and any appreciable national taxonomies. We may add, amend or remove elements of the Framework from time to time to reflect our business activities and ESG priorities. Where we do so we will update the SPO on the Framework. Any changes we make to the Framework from time to time will apply from the date the Framework is updated. Changes will not apply retrospectively to transactions already classified as Sustainable Finance transactions and included in our Sustainable Finance register under previous version of this Framework.

Annual assurance in relation to compliance with the Framework for any outstanding Green Loans, Social Loans or SLLs will be provided as part of our annual audit.

Appendix 1

Sustainable Finance identification and classification process



Appendix 2

Sample SLL Key Performance Indicators

KPI level	KPI Type	KPI Category	Relevant KPI	Benchmark
Borrower	Environment	Green Building Ratings	% of Portfolio (m2) with min Green Buildings Rating	Green Star 5+, NABERS Energy 5+, NatHERS 7+ GRESB Benchmark Rating
			Min GRESB score or improvement in GRESB score	
	Carbon/GHG Emissions	% reduction in Scope 1 + 2 GHG emissions - absolute (Portfolio/Company)	% reduction against baseline	
		% reduction in Scope 1 + 2 + 3 GHG emissions - absolute (Portfolio/Company)	% reduction against baseline	
		% reduction in Scope 1 + 2 GHG emissions - intensity (Portfolio/Company)	% reduction against baseline	
		% reduction in Scope 1 + 2 + 3 GHG emissions - intensity (Portfolio/Company)	% reduction against baseline	
		Carbon Neutral certification (Portfolio/Company)	Climate Active	
		% of Portfolio (m2) fossil fuel free (fully electrified)	% of total m2	
	Renewable Energy	Renewable energy (kWh/m2/yr) generated (Portfolio)	NABERS Renewable Energy Indicator	
		% renewable energy purchased (Portfolio/Company)	NABERS Renewable Energy Indicator	
Water	% reduction in water consumption (Portfolio/Company)	% reduction/yr		
	% of Portfolio (m2) with min water rating	NABERS Water 4+		
Waste	% reduction in waste sent to landfill (Portfolio/Company)	% reduction/yr		
	% of non-hazardous waste recycled or reused	% recycled/reused/yr		
	% of Portfolio (m2) with min waste rating	NABERS Waste 5		
Social	Access & Affordability	% of portfolio (m2) social, affordable, disability housing	% of total m2	

Asset	Diversity & Inclusion	% female employees	40:40:20	
		% female senior management roles	40:40:20	
		% female board members	40:40:20	
		% non-gender based diversity	% of FTE	
		% of employees identifying as Aboriginal and Torres Strait Islander	% of FTE	
		Sustainable Sourcing	% of products/suppliers with a sustainable supply/eco certification	% of total spend
	% of products/suppliers locally sourced		% of total spend	
	% of products/suppliers sourced from indigenous suppliers		% of total spend	
	Governance	Policies	Implement a Company/Group ESG Policy	Board approved and published on company website
			Implement a Reconciliation Action Plan (RAP)	Reconciliation Australia endorsed
			Implement a Modern Slavery Statement (publicly available) - where not already legally required to do so	Statement meets all mandatory criteria
	Disclosure	Publicly report Scope 1 + 2 GHG emissions (Portfolio/Company)	Absolute emissions tons or kg CO2-e	
		Publicly report Scope 1 + 2 + 3 GHG emission (Portfolio/Company)	Absolute emissions tons or kg CO2-e	
Education & Training	% of employees undertaking ESG training	% of FTE		
Environment	Green Buildings	Min Green Building Rating	Green Star 4+, NABERS Energy 5+, NatHERS 7+	
	Carbon/GHG Emissions	% reduction in Scope 1 + 2 GHG emissions (Asset - operational)	% reduction against baseline	
		% reduction in Scope 1 + 2 GHG emissions (Asset - embodied)	% reduction vs BAU	
		Removal of fossil fuel sources (building electrification)		

Energy Efficiency

% energy efficient lighting installed

% total lighting

Min MEPS appliances installed

MEPS within 1 of best available

Window upgrades (double/triple glazing installed)

% total glazing

Lift/plant upgrades (energy efficient lifts/hot water/heating/cooling installed)

Min NABERS Energy rating

NABERS 5+

(commercial/retail/industrial/apartments)

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