The GPT Group
Climate and Nature Disclosure Statement 2024

Experience First

Important Notice and Disclaimer

This Climate and Nature Disclosure Statement (Statement) has been prepared by The GPT Group comprising GPT RE Limited (ACN 107 426 504; AFSL 286511), as responsible entity of the General Property Trust, and GPT Management Holdings Limited (ACN 113 510 188) (together, GPT). It has been prepared for the purpose of providing GPT's investors with general information regarding GPT's performance and plans for the future with respect to climate and nature-related risks and opportunities.

Forward-looking statements

This Statement contains forward-looking statements and statements of opinion. These include statements regarding the plans, strategies and objectives of GPT's Board and management relating to climate and nature; GPT's purpose, values, targets and goals in relation to sustainability including GPT's targets in relation to climate and nature; and GPT's future performance in relation to climate and nature targets and metrics.

All forward-looking statements reflect GPT's expectations at the date of this Statement and are not guarantees or predictions of future performance or outcomes. They may be impacted by a range of uncertainties and dependencies, including changes to external enablers for GPT to be able to achieve its strategies (e.g. technological advancements, increased availability of lower-emissions energy and building materials, the availability and quality of carbon and biodiversity offsets, and policy support and fluctuations in carbon and energy markets). See below in relation to 'Uncertainty and estimation'.

Scenario analysis

GPT uses scenario analysis as a tool to understand potential climate risks and opportunities under different circumstances. There are limitations with respect to climate scenario analysis, and it is difficult to predict which, if any, of the scenarios might eventuate. Scenario analysis is not an indication of probable outcomes and relies on assumptions that may or may not prove to be correct or eventuate.

Uncertainty and estimation

No representation or warranty is given as to the accuracy, completeness, likelihood of achievement or reasonableness of any forward-looking statements contained in this Statement or the assumptions on which they are based. Users of this Statement are cautioned not to place undue reliance on such statements, particularly in light of the long time horizon which this Statement discusses and the inherent uncertainty in possible policy, market and technological developments in the future.

Such material is inherently subject to significant known and unknown risks, uncertainties and contingencies, many of which are outside of GPT's control. Actual results, circumstances and developments may differ materially from those expressed or implied in this Statement, including, but not limited to, economic and market conditions; the extent, nature and location of physical impacts of climate change or nature-related matters; geopolitical developments; policy, legal and regulatory changes; technological changes; price fluctuations; industry competition; and project approvals, delays and costs.

Information is stated as at 31 December 2024 unless otherwise indicated. Except as required by applicable laws or regulations, GPT does not undertake to publicly update or review any forward-looking statements, whether as a result of new information or future events.

All values are expressed in Australian dollars unless otherwise indicated.

Due to the inherent uncertainties in measuring or quantifying greenhouse gas (GHG) emissions, references to emissions and emissions intensity are estimates, and GPT does not guarantee the accuracy of this information.

Front cover image: Riverside Centre, Brisbane

Important Definitions and Context

Interpretation of terms like carbon neutral, net zero, nature and nature positive can vary and have different meanings depending on context. For these major terms, we are providing background so that readers have clarity on what these terms mean in the context of our business. Additionally a glossary is included from pages 45–48 to provide clarity for a number of other terms with more detailed information and GPT-specific context.

Carbon Neutral vs Net Zero Plan vs Climate Transition Plan

Carbon neutral means reducing emissions where possible and compensating for the remaining emissions by investing in carbon offset projects to achieve net zero overall emissions, as defined in the Australian Government Climate Active Carbon Neutral Standards. We generally use the term decarbonise to describe the process of reducing GHG emissions and the term 'Carbon Neutral' to describe the achievement milestones for our emissions reduction targets as part of our overall Net Zero Plan. GPT's carbon neutral targets and outcomes have a reporting boundary of emissions under our operational control, meaning the emissions over which we have principle decision-making authority, (outlined in further detail in GPT's Net Zero Plan on page 10). GPT's Carbon Neutral achievements were certified in 2024.

Within this Statement, we provide detail on our measurement and reporting boundaries for our Carbon Neutral milestones which can be reviewed further in our Sustainability Data Dashboard.

With regards to emissions, the focus of this statement is emissions that are deemed to be material and for which we have operational control. Greatest levels of influence apply to Scope 1 and 2 emissions and whilst we acknowledge that future reporting may extend to Scope 3 emissions, that is not the focus of this statement.

GPT's Net Zero Plan describes our broader climate response which includes both efforts for decarbonisation and an orderly transition to a resilient low carbon economy, so our business prospects are protected in whichever climate scenario eventuates. The terminology of Climate Transition Plans or Climate Transition Action Plans could also be used to describe GPT's Net Zero Plan.

Nature, Nature Negative and Nature Positive

Climate and the atmosphere are subsets of nature and the effects of increased carbon concentrations affect land, freshwater, oceans and biodiversity.

GPT aims to invest in processes that achieve a positive impact across multiple systems of nature, while simultaneously mitigating multiple risks. Our focus of **Carbon Neutral Now, Nature Positive Next** describes our parallel investment in climate and nature responses and also that our focus is delivering our carbon neutral milestones while taking steps towards addressing our nature goals. While we are delivering on carbon neutral milestones already, there is still much more to consider on the broader nature goals.

Like decarbonisation, nature positive can have numerous meanings. At GPT, we have adopted the following International Union for Conservation of Nature (IUCN) definition:

A nature-positive future means that we, as a global society, halt and reverse the loss of nature measured from its current status, reducing future negative impacts alongside restoring and renewing nature, to put both living and non-living nature measurably on the path to recovery.

In practice, for GPT this means first understanding and measuring the nature negative activities. That is, natural environments that have been displaced by our buildings and the direct impacts on nature and its resources. We will take action to reduce and eliminate these nature negative impacts where possible.

Next, where possible, we will enhance natural environments within our properties, then finally compensate for residual impacts through nature restoration projects. Nature impacts will target multiple natural systems, such as reforestation projects that remove carbon, improve biodiversity and improve water quality and flows.

Over time we are implementing metrics and targets for reducing nature negative outcomes and delivering positive outcomes for nature.

Like our Net Zero Plan, GPT's Nature Plan is being developed to assist us in managing any nature-related risk to our business and, where possible, leverage opportunities from our understanding of how our business activities interact with nature.

For more on GPT's Nature Plan approach, see page 12).

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GPT acknowledges the Traditional Custodians of the lands on which our business operates.

We pay our respects to Elders past, present and emerging, and to their knowledge, leadership and connections.

We honour our responsibility for Country, culture and community in the places we create and how we do business.

Artwork created through collaboration of Cultural Grounding and Elaine Chambers Hegarty (Koa and Kuku Yalanji).

Sustainability Reporting

The International Sustainability Standards Board's (ISSB) International Financial Reporting Standards (IFRS) S1 and S2 has created a framework for investor-focused sustainability reporting. As an adopter of the Task Force on Climate-related Financial Disclosures (TCFD) and Taskforce on Nature-related Financial Disclosure (TNFD) frameworks, GPT is using the framework of ISSB Standards to guide our 2024 sustainability reporting, on climate change and nature, contained in our second Climate and Nature Disclosure Statement (Statement).

This Climate and Nature Disclosure Statement has been prepared on behalf of The GPT Group (GPT or Group), including GPT Funds Management Limited, the responsible entity for the GPT Wholesale Office Fund (GWOF) and the GPT Wholesale Shopping Centre Fund (GWSCF).

The Statement describes the process for identifying climate and nature-related risks and opportunities, including those related to our operations, supply chains, and broader value chain impacts, and our methods for formulating and implementing our ongoing response. GPT also applies the same management practices to the investment management and property management services that we provide to our mandates and joint ventures. Throughout this Statement, we have grouped together climate and nature-related matters where they align and outlined them separately where distinct processes are required.

Our climate-related plans, financial risks, and opportunities are reported using the framework of the climate-related Australian Sustainability Reporting Standard (ASRS) issued by the Australian Accounting Standards Board (AASB S2 Climate-related Disclosures).

The Statement is structured around the pillars of IFRS S1 and S2 and AASB S1 and AASB S2, allowing us to cover climate and nature in a single disclosure. This Statement is structured around the ISSB Standards' four pillars:

- Governance pages 6–9
- Strategy pages 10–24
- Risk Management page 25–27
- Metrics and Targets 28–31

This Statement is voluntary.

In 2024, GPT conducted an externally facilitated double materiality assessment of sustainability issues. This assessment contributes to our ability to adhere to the forthcoming AASB reporting requirements, and the materiality assessment results are detailed on our website.

While managing climate risk remains a major focus, there is also a growing recognition of the importance of nature to the economy and the risks associated with the accelerating loss of nature and biodiversity worldwide. Using the framework of the TNFD, we have been able to assess, report and where possible act on our nature-related dependencies, impacts, risks and opportunities.

Our Climate and Nature Disclosure Statement was approved by the GPT Board on 14 February 2025 with preparation overseen by the management-level Sustainability Steering Committee in consultation with the Sustainability Reference Group.

This Statement is part of GPT's 2024 corporate reporting suite, with additional detail on our sustainability response found across other reports, statements and resources as stated in the adjacent feature box. We acknowledge that across the reporting suite audiences may vary, therefore some information has been duplicated, where necessary.

Reporting suite

Annual Report
An integrated report summarising the value created by GPT's business activities that includes the annual financial statements for the Group.

Corporate Governance Statement
An annual statement of how GPT addresses the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition).

GPT Website
Contains information about our enterprise policies, processes and sustainability initiatives.

Modern Slavery Statement
An annual statement describing GPT's actions to assess and address modern slavery risk in our operations and supply chain.

Reconciliation Action Plan (RAP)
GPT's second Stretch RAP outlines our formal commitments with measurable objectives to reconciliation with First Nations peoples of Australia.

Sustainability Data Dashboard
An overview of our key ESG performance data, including metrics, targets and risk registers to support the aim of global sustainability reporting frameworks.

Sustainability Website
Our policies, performance and progress in addressing material environmental, social and governance (ESG) matters.

Sustainable Debt Framework
A framework outlining how we intend to issue and manage sustainable debt instruments across GPT and its managed funds.

A message from the CEO and Managing Director

GPT considers and assesses the economic, environmental and social risks associated with climate change and nature degradation. We are taking steps to reduce our environmental impact, decarbonise our portfolio and mitigate the potential impacts of climate and nature-related risks on our business.

GPT values environmental sustainability by driving efficiency, reducing resource consumption and pollution associated with our operations. We are also investing in restorative offsets to deliver some positive impacts.

In 2024, we strengthened the integration of sustainability into our operations. These steps support our dual aims of being a positive contributor to the environment and resilient to the physical and transitional risks associated with a changing environment.

We acknowledge the environmental impacts of our business and will take steps to mitigate them, including impacts related to climate change, the degradation of water and biodiversity values, and the linear economy. To reduce negative environmental impacts and take action towards our aim of positive outcomes for nature by 2030, GPT has established targets, underpinned by plans that are regularly reviewed and updated.

GPT has made progress in our Net Zero Plan, including achieving our 2024 target of carbon neutral certification for GPT-managed operational assets and delivering new developments with upfront embodied carbon neutrality.

We are focusing on our Nature Plan, with targets and metrics being established. Beyond our own operations, and where feasible, we will work to influence our stakeholders, including investors, tenants and suppliers, to adopt sustainable practices.

In developing our strategies and policies on climate and nature, we consider industry relevant goals and targets of international agreements such as the Paris Agreement.

In 2024, we continued our work on progressing positive outcomes for nature. We recognise that these are evolving areas and subject to change and we will continue to consider and adjust our policies as appropriate in this dynamic landscape.

This Statement outlines how GPT is addressing climate and other nature-related challenges that could impact our business. By understanding and acting on the associated risks and opportunities, we are better positioned to deliver value, innovation, and sustainable growth for our stakeholders, including investors.

Russell Proutt
Chief Executive Officer and Managing Director

Year in Review: Data & Insights

GPT is a leading Australian commercial property owner having both operational buildings and new developments certified against the carbon neutral standards.

Climate

94%
emissions intensity reduction (net Scopes 1 & 2) since 2005[1].

$1.2b
GPT and GWOF combined issued over $1.2 billion of sustainable debt by end 2024

100%
of GPT operational assets reviewed for climate vulnerability (not including assets held for development)

11.2MW
of installed solar PV capacity on GPT-owned assets

53%
energy intensity reduction since 2005[1]

100%
of GPT's owned and managed Office and Retail assets are carbon neutral certified (not including assets held for development)

1. Measured against GPT's 2005 baseline as at 31 December 2024. Detailed data and breakdowns are available in GPT's sustainability data dashboard

Nature

35%
closed loop recycling

306ha
of native trees planted via GPT's 'Restoring Country for Climate' partnership since 2022

54.3ha
cleared in accordance with approved developments

56%
water intensity reduction since 2005[1]

100%
of GPT's assets reviewed for biodiversity, stormwater and heritage interfaces

21%
of GPT assets assessed for green space biodiversity values since 2022

1.0 About Us

GPT is one of Australia's leading real estate investment managers, with assets under management of $34.1 billion across a diverse portfolio of high quality retail, office and logistics assets primarily located in major capital cities.

1.1 GPT's core business

GPT undertakes four core business activities. We invest in, develop and manage Australian real estate assets and funds to create value for our stakeholders. We generate income in the form of rents from our portfolio of diversified properties and fees from our funds management activities. In addition to income, the capital growth of our portfolio drives the total return for our investors.

Our strategic ambition

To position GPT to become Australia's leading diversified real estate investment manager, dedicated to providing exceptional value, innovation, and sustainable growth for our investors and stakeholders.

Our execution strategy is underpinned by four fundamental elements:

- Operational excellence: Exceptional operational capability is core to GPT's value proposition to our investors and partners.
- Value creation: Investment proficiency and effective capital allocation to drive long-term performance.
- Diversified platform: Breadth of expertise provides strategic flexibility and enables a superior offering to partners.
- Aligned partnering: Fostering trusted relationships underpins successful and sustainable growth.

Our purpose

We create experiences that drive positive impact for people, place and planet.

GPT's values

Everyone Counts
Imagine if ...
Go for it!
Make an Impact

For more detail on GPT's purpose, values and business activities, see our 2024 Annual Report.

Our sustainability ambition is to embed scalable solutions that support our growth while driving leading environmental, social and financial outcomes for our investors, tenants and stakeholders.

1.2 Embedding sustainability

At GPT, we recognise that our business is both shaped by and has the potential to shape sustainability-related issues, particularly in the environments around our assets and the communities in which we operate. In response to this, we have embedded sustainability practices throughout our operations, integrating them into our organisational culture, stakeholder engagement, development design, governance, and investment decisions.

We refine our approach by measuring, reducing, and eliminating negative environmental impacts in alignment with our operational procedures and scientific data. When impacts are unavoidable, we adopt a restorative approach to offset them, maximising both social and environmental co-benefits.

Our policy objectives are informed by the targets and goals of the Paris Agreement, the United Nations Global Compact (UNGC) and industry-relevant targets. The purpose of our environmental policy suite is to create resilient assets that enhance both financial performance and environmental outcomes.

Key policies include:

Climate Change

GPT aims to decarbonise and be resilient to the impacts of climate change.

Energy

GPT aims to drive energy efficiency and shift to renewables, while supporting a resilient transition to a low carbon future.

Materials and Resource Circularity

GPT aims to procure, use and recover materials in a closed-loop, circular manner.

Human Rights

GPT is committed to maintaining high ethical standards in our business practices and decision making, including respecting the human rights of all individuals we engage with.

Biodiversity

GPT aims to have a net positive impact on biodiversity and to be resilient to nature-related risks.

Water

GPT aims to be water neutral and resilient to water-related risks to our business.

For more detail on the specifics of each policy, see our Sustainability website.

2.0 Governance

GPT's approach to managing climate, nature and broader human rights risks and opportunities is based on strong governance and integrating sustainability practices into our business.

We publicly report on our sustainability practices and performance to keep our stakeholders informed. These reports detail the governance processes, controls and procedures we use to monitor, manage and oversee sustainability-related risks and opportunities.

At GPT we have a range of policies in place to guide the delivery of our sustainability goals. These policies provide the link between our sustainability objectives and our day-to-day practices by identifying key focus areas and establishing aligned processes that facilitate decision making. For more on our sustainability-related policies, see our website.

Sustainability-related business risks, which include physical and transitional climate risks, emissions and decarbonisation challenges, water, resource circularity and biodiversity are considered and managed in accordance with the GPT Risk Management Framework (RMF). This process applies the same governance around risk identification, assessment and management as for other key business risks. GPT's Risk Management Framework is aligned to ISO 31000:2018 and was independently validated for alignment in 2022.

Our approach to scoping, identifying and managing environmental impacts from sustainability-related risks and opportunities, is addressed through our ISO 14001:2015 certified Environmental Management System (EMS).

Social sustainability is a key consideration in our decision-making. We prioritise salient human rights issues such as community health, safety and security, labour rights in GPT's supply chain and other business relationships. We also consider land and cultural impacts, including First Nations engagement and broader issues relating to safety and equity.

2.1 Sustainability-related governance framework

The Group's Sustainability Governance Framework (Figure 1) facilitates our approach to managing climate change, nature, biodiversity and other sustainability-related risks and opportunities across GPT to mitigate potential negative impacts and maximise potential opportunities. This framework was updated in 2024 to reflect the Board and Management changes.

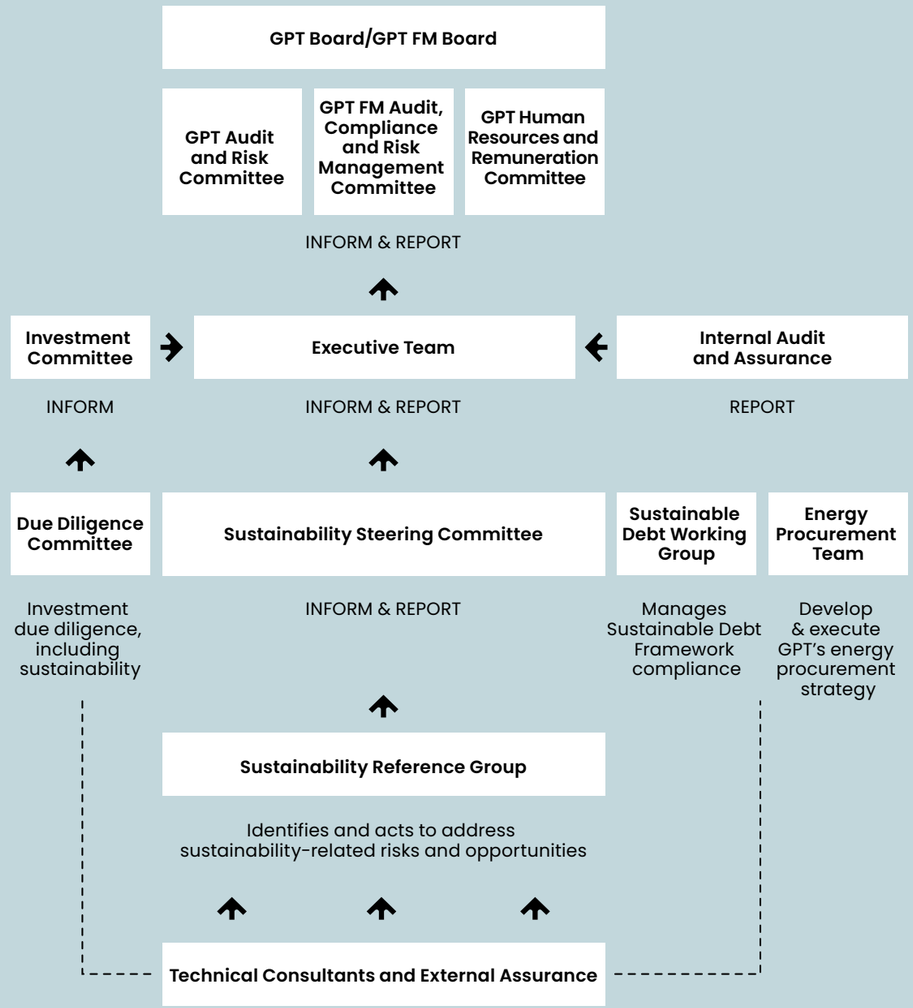


Figure 1: Sustainability-related governance framework

2.2 Board oversight

The GPT Board has ultimate responsibility and oversight for the application and management of the GPT's Risk Management Framework and Environmental Management System (EMS). The Board monitors the impacts, risks and opportunities associated with climate change, nature and other sustainability-related matters, so that they are appropriately identified and assessed on behalf of all entities in The GPT Group activities, including GPT Funds Management Limited (GPTFM) and our management of mandates and joint ventures.

During the year, the Board was engaged through Board meetings, presentations and papers in its governance responsibilities, fulfilling its role in accordance with the Board and Committee Charters. The Board has a mix of skills and competencies across areas such as health, safety, procurement, social responsibility and sustainability initiatives in large organisations. This diverse skill set provides insights into the potential business impacts of climate and nature-related risks. The Chairman of the Board is an independent Non-Executive Director with the appropriate qualifications and experience to carry out that role.

The skills and experience of the Board are reported in the 2024 Corporate Governance Statement.

2.3 Board Committees

The Board has established the Audit and Risk Committee, Human Resources and Remuneration Committee and Nomination Committee to assist in carrying out its responsibilities. After the May 2024 Board meetings, the Sustainability and Risk Committee was discontinued and its functions merged into the Board, Audit and Risk and Human Resources and Remuneration committees to better align the roles. Subsequently, sustainability-related issues are now presented directly to the Board, with additional oversight for assurance programs and the Risk Management Framework provided by the Audit and Risk Committee.

Additional committees and groups that have played a role in sustainability governance during the year are listed in section 2.6.

The Board Audit and Risk Committee assists the Board in:

- Reviewing and recommending to the Board for approval the financial statements, including audit process associated sustainability disclosures
- Reviewing the external auditor's qualifications, performance, audit plans and independence
- Overseeing GPT's internal controls and the internal audit function, and
- Overseeing the effective operation of GPT's risk management and compliance frameworks.

The Board, Audit and Risk Committee and Human Resources and Remuneration Committee charters were reviewed in 2024 to reflect the changed responsibilities and oversight and to meet evolving governance practices.

The Chairman of each Committee is an independent Non-Executive Director with the appropriate qualifications and experience to carry out that role. The Board receives minutes of Committee meetings and regular updates from Committee Chairs to enable effective communication and information sharing.

2.4 Key sustainability-related activities by the Board and Committee in 2024

Climate and nature-related activities in 2024 for the Board and Audit and Risk Committee were:

- Directors were briefed on various aspects of the international sustainability reporting standards and the Australian Sustainability Reporting Standards and the impacts for GPT
- Undertook specific review into nature-related risks, metrics and target setting with focus areas of climate change, biodiversity and water
- Monitored GPT's performance on key sustainability metrics and oversaw implementation of strategies to improve performance
- Considered potential impacts and materiality of climate and nature-related risks on GPT's core business strategy, and
- Oversaw matters relating to the sustainable debt issued by GPT.

See Section 2.6 for a summary of the responsibilities and membership of each Board Committee and GPT's various sustainability-related management committees.

2.5 Management Accountability

In addition to responsibilities of individuals, Management has established special purpose committees and working groups to focus on specific sustainability matters, with reporting provided to the Board and its committees as appropriate.

GPT's Chief Executive Officer (CEO) and Managing Director is accountable for overseeing that GPT is identifying, assessing and managing material sustainability-related risks and opportunities, including those related to climate change and nature, in accordance with the RMF.

Until September 2024, the Chief Risk Officer (CRO) reported directly to the CEO and was part of the Executive Team. The CRO was responsible for overseeing the effective management of climate and nature-related risks and opportunities, adhering to established risk and environmental management frameworks and integrating sustainability considerations into the company's strategic planning. This included participating in key committees and advising the Executive Team on emerging sustainability trends and risks. In October 2024, a Chief Investment Officer (CIO) role was created and commenced in early 2025. The CIO will be responsible for sustainability.

The Head of Sustainability manages climate and nature-related risks, in accordance with GPT's policies and ISO 14001. The Sustainability Steering Committee, which includes the Head of Sustainability and senior managers from Risk, Finance, Investor Relations and Operations, oversee the implementation of sustainability-related risk management procedures.

All employees, including business unit managers, are responsible for managing risks, including climate and nature-related risks. Business unit managers review their risk registers bi-annually with the Risk Team and are represented on the Sustainability Reference Group to embed sustainability policies and procedures.

Key performance indicators (KPIs) that monitor environmental performance are established at an asset level. Corporate metrics and targets (listed on our Sustainability Data Dashboard) are monitored by subject matter experts in the Sustainability Team and progress is reported through to the relevant Executive Team members and the Sustainability Steering Committee.

Climate and nature-related activities in 2024 for Management included:

- Considered risks and opportunities, including in relation to climate and nature (including biodiversity, water and resource circularity)
- Continued application of our Environmental Management System
- Assurance of key data as well as ratings and certifications for energy, water, waste, indoor environment quality and carbon neutrality, and
- Progressed strategies, metrics and targets disclosed in this Statement including the Net Zero Plan, Nature Plan, Energy Master Plan and Water Master Plan.

The Sustainability Team is responsible for formulating and driving implementation of GPT's environmental sustainability initiatives across the business. The team includes capabilities in the following areas:

- Building optimisation and data analytics
- Climate science and adaptation processes for the built environment
- Water and energy management
- Biodiversity and ecology
- Resource circularity and waste management, and
- Human rights including community and First Nations engagement.

2.6 Summary of Governance processes

Table 1: Summary table of Governance activities

Name and composition	Meeting regularity	Sustainability governance role
GPT Board of Directors ("Board") Six independent Non-Executive Directors and one Executive Director	8x a year or more frequently if required	• Oversee application and management of the Risk Management Framework (RMF) and the Environmental Management System (EMS). • Oversee overall approach to sustainability risks and opportunities, particularly in the context of Group strategy and major investments and performance metrics. • Review and approve sustainability metrics and targets and external sustainability reporting, including the Climate and Nature Disclosure Statement (CNDS).
Board Sustainability and Risk Committee (SRC) Three independent Non-Executive Directors *(Discontinued in May 2024)*	2 meetings held in 2024 after which its functions were merged into the Board	• Assist the Board in overseeing risk management, including climate change, nature-related risks, and sustainability initiatives. • Review quarterly reports on Environmental Management System (EMS), and track progress against sustainability targets. • Review and recommend to the Board for approval GPT's CNDS, metrics and targets. • Reports to the Board.
Audit and Risk Committee (ARC) Three independent Non-Executive Directors	6x a year	• Oversee GPT's corporate reporting, treasury, taxation, internal audit and external audit practices, including assurance of sustainability data. • Reports to the Board.
GPT Funds Management Board (GPTFM) Five independent Non-Executive Directors and one Executive Director (the GPT Group's CEO)	8x a year or more frequently if required	• Oversee sustainability strategy for the Funds.
GPTFM Board, Audit, Compliance and Risk Management Committee (ACRMC) Five independent Non-Executive Directors	Quarterly	• Sub-committee of the GPTFM Board. • Review reports on actions being undertaken by GPT to meet the Funds' sustainability strategies. • Review the GPT Sustainability Framework and strategy as it relates to the Funds.
Investment Committee (IC) COO (Chair until June 2024), CEO (Current Chair), CRO (Member until September), CFO, General Counsel and Heads of Retail, Office and Logistics	Monthly or more frequently if required	• Review investment and major expenditure proposals for capital allocation, taking into consideration sustainability-related risks and alignment with GPT's risk appetite and strategic goals, including customer experience, environmental impacts, reputational impacts, risk mitigation, strategic alignment and operational and safety matters. • Decisions of the IC are subject to sign off by the Due Diligence Committee, when required.
Due Diligence Committee (DDC) CRO (Chair until September), General Counsel (Current Chair) and representatives from Capital Transactions, Financial Analysis & Planning, Research, Treasury, Tax, Risk and Sustainability	As required	• During due diligence, assess the risk of the proposal with respect to sustainability matters. • Reports to the Investment Committee.
Sustainability Steering Committee (SSC) CRO (Chair until September), representatives from the Executive Team, Sustainability, Risk, Finance and Investor Relations	3x a year	• Oversee climate and nature-related disclosures, together with other business sustainability initiatives. • Review and provide input on matters to be reported to Board. • Provide guidance on sustainability strategy, risk management, metrics and targets. • Reports to the Executive Team.
Sustainability Reference Group (SRG) Business unit managers from Retail, Office, Logistics, Asset Management, Property Operations, Development, Funds Management, Sustainability, Procurement and Finance	3x a year	• Discuss sustainability-related risks and opportunities and deliver responses in business units. • Supports the Sustainability Steering Committee to embed ongoing sustainability management processes across business activities.
Climate and Nature Disclosure Delivery Team Representatives from Sustainability, Finance, and Investor Relations, with contributions from other areas as required	Working group meeting ~ 20 times annually	• Preparation of the Climate and Nature Disclosure Statement. • Establishment of processes and materials for the Australian Sustainability Reporting Standards.
Sustainable Debt Working Group Representatives from the Treasury and Sustainability teams	4x a year or more frequently as required	• Enable access to sustainable finance for GPT in accordance with the Sustainable Debt Framework (SDF). • Supports the GPT Treasury Committee and the Sustainability Steering Committee.

2.7 Climate linked remuneration outcomes

Accountability for the Group's sustainability and climate-related targets and outcomes are reinforced through KPIs in the performance targets of the Head of Sustainability, all members of the Sustainability Team and key operational-level team members. These KPIs were previously also included in the performance targets of the Chief Risk Officer. Climate-related performance indicators are designed to support the primary KPIs used for climate transition in various benchmarks and frameworks. In the case of the Head of Sustainability, these KPIs are directly linked to remuneration outcomes and were reported quarterly to the Board Sustainability and Risk Committee until May 2024 and consequently reported direct to the Board following above noted structure changes.

2.8 Considering climate and nature factors in major investment decisions

To achieve our policy objectives, GPT continuously monitors and assesses sustainability-related risks and opportunities likely to impact our assets and incorporates these into capital allocation and operational decision making. The GPT Investment Committee also considers climate and nature-related risks and opportunities. Specific reviews are implemented with feedback provided to the Investment Committee on:

- Potential impacts from physical and transitional climate risks
- Complexities associated with sensitive biodiversity or stormwater risks, and
- Cultural heritage and community engagement reviews.

As an example of how climate and nature-related risks and opportunities have been recently factored into our operational decision making, we are working to transition our buildings to all-electric operations to reduce gas emissions. To eliminate gas emissions from food and beverage businesses at our assets, we are working with our tenants, leasing executives and tenancy design managers to consider electric alternatives, including how this is possible in new developments and centre expansions. Despite the challenge of overcoming entrenched preferences by tenants for gas, upgrading electrical capacity will be crucial for this transition, leading to reduced GHG emissions and improved energy efficiency.

For more information, see our Energy Master Plan.

Operational reviews help us understand investment risks and opportunities to manage trade-offs with the aim to achieve the best balance of environmental, social and financial outcomes.

To reconcile trade-offs, we focus on our strategic priorities while implementing mitigation plans to manage risks or impacts. Trade-off decisions also aim to maximise long-term value for our stakeholders. For instance, a climate response-related decision for electrifying buildings may involve short-term capital costs and reduced energy ratings, but it addresses long-term risks like rising gas costs, stranded assets, and tenant dissatisfaction, ultimately increasing value for GPT and our stakeholders.

An example of a nature-related decision making with trade-offs is balancing the amount of displacement of biodiversity alongside the aim to maximise floor space during developments. In such cases, the value of biodiversity, potential offset costs, and the impact on approvals are carefully considered to find the optimal balance for the development. At times, this may involve reducing floor space to protect biodiversity, which can offer additional benefits, such as accelerating development approvals, enhancing site amenity, strengthening ecosystem services and resilience, and aligning with the expectations of investors, tenants, and the community.

Rouse Hill Town Centre, NSW

NET ZERO PLAN

Net Zero Plan – GPT's climate transition

Our Net Zero Plan for an orderly transition to a resilient, low carbon economy, includes both decarbonisation goals with certified carbon neutral milestones as well as goals to improve climate resilience. Through our Climate Change Policy, we take actions to support the aim of the Paris Agreement to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels." (UNFCCC).

Decarbonisation

GPT has set and is delivering on carbon neutral milestones for all material emissions (Scope 1 and 2) where we have principal decision making authority. The table below summarises how we measure, reduce and eliminate, offset and disclose to achieve our decarbonisation aims. For further details about our decarbonisation approach for material emissions where we have principle decision making authority, see our Energy Master Plan and our Upfront Embodied Carbon Case study.

Table 2: GPT's climate transition approach

	Corporate Emissions	Building Operations	Upfront Embodied Carbon
Measure		Operationally controlled emissions	
	Emissions from office electricity, proportion of base building emissions, flights, accommodation, services and consumables	Emissions from gas, refrigerants and diesel, electricity, water and waste	Emissions from construction materials and processes
Reduce and eliminate	Improve office energy efficiency	Efficient buildings	Design efficiencies
	Use renewable electricity	100% on-site and off-site renewable electricity	Low embodied carbon materials
	Preference carbon neutral buildings and consumables	Electrification of assets	Low carbon construction processes
	Carefully evaluate travel	Use of low Global Warming Potential refrigerants	
Offset	GPT offsets only residual emissions to achieve net zero after aiming to reduce and eliminate emissions where feasible. For GPT, efforts to reduce emissions for corporate and building limit offsets of baseline emissions while offsets for embodied carbon for developments are significantly higher		
Disclose	Independently validate and transparently disclose outcomes and processes		

Climate Resilience

Key elements of GPT's climate resilience strategy considers:

- Detailed climate risk reviews and strategy responding to identified risks
- Asset-level climate adaptation plans addressing transition and physical risks
- Demand-side flexibility and electric vehicles (EV) plans for an orderly transition to a low carbon grid
- Energy procurement framework to minimise exposure to high and volatile energy costs
- Climate-related outcomes linked to sustainable finance as defined by the Sustainability criteria adopted by the debt investors
- Securing long-term supply, credibility and cost for offsets, and
- Decarbonisation strategies that improve resilience to climate-related transition risks.

For further details about our climate resilience approach, see our Managing Climate Risk Report.

Leveraging our influence

We acknowledge that our stakeholders will have their own net zero or climate transition plans and to best support their decarbonisation goals, we assist them with products that offer low GHG emitting or carbon neutral certified buildings, management services and energy contracts (where we have embedded networks and generation options). See figure 2 for an example of GPT logistics developments which include solar arrays to reduce emissions from electricity. With base building emissions often accounting for around a quarter of corporate emissions, GPT's carbon neutral buildings are an important decarbonisation step for our 3000+ tenancies. Acting on emissions outside of our operational control is largely about leveraging our influence to support others to lower their emissions. Further detail about GPT's approach to emissions can be found on our website.

Figure 2: 100 Metroplex Place, Wacol, QLD - GPT's logistics developments include solar arrays to assist in reducing tenants' emissions.

Nature Plan

We are continually refining our nature-related strategic priorities as part of our broader environmental sustainability initiative, 'Carbon Neutral Now, Nature Positive Next.' This aligns with our Net Zero Plan, recognising that climate is a vital component of nature.

Our policy is aimed at positively impacting the environment while strengthening business resilience to nature-related risks and dependencies. Our nature strategy focuses on three key areas: Biodiversity, Water, and Materials & Resource Circularity. For further detail see our sustainability website.

Table 3: GPT's nature impact mitigation approach

	Biodiversity	Water	Resource Circularity
Measure	Assess nature-related impacts, dependencies, risks, and opportunities, and incorporate them into decision making processes.		
	Measure displacement of natural environments, intersections with significant ecological communities and species.	Measure portable water consumption, stormwater impacts and exposure to ecologically sensitive catchments.	Measure materials consumption, waste to landfill and pollution, including CO_2 from materials and waste and resource recovery.
Reduce and eliminate	Prioritise impact avoidance, and where avoidance is not commercially viable, reduce biodiversity impacts. Conduct biodiversity assessments and develop targeted management plans, which include the restoration of on-site ecological communities, species, and their habitats.	Implementing GPT Water Master Plan. Reduce water use through water efficiency measures. Reduce stormwater impacts by rainwater capture and re-use or release and pollution controls.	Reduce depletion and pollution to levels re-absorbed by the environment without harm. Reduce impacts through materials selection design efficiencies. Design for re-use and improve materials recovery.
Offset	Restore off-site ecological communities, species, and habitats. Adopt the "last but not later" approach—use offsets only when impacts cannot be eliminated or reduced.		
	'Restoring Country for Climate' offsetting agreement with Greenfleet will result in permanent carbon removal and improved biodiversity outcomes. Investigate new and emerging voluntary biodiversity offset markets.	Review and pilot options for a credible water offset process that also delivers biodiversity and climate co-benefits (e.g. wetland or water catchment rehabilitation projects).	Implement climate biodiversity and water programs with tangible restorative aspects aiming to compensate for residual impacts in materials and waste supply chains.
Disclose	Independently validate and transparently disclose outcomes and processes.		

Nature resilience

Key elements of GPT's nature resilience strategy include:

- Identification and assessment of nature-related dependencies, impacts, risks, and opportunities in line with the mitigation hierarchy, with the goal of eliminating or reducing negative impacts and risks, while enhancing positive impacts and opportunities
  - Stormwater: Assess the direct interface with stormwater flow and quality across our operational assets and developments, considering both pre-development and post-development conditions
  - Biodiversity: Assess the direct interface with nationally and state-listed ecological communities and species across our operational assets, developments, and offsets, and
  - Cultural Heritage: Assess the direct interface with cultural heritage values across our operational assets, developments and offsets, encompassing both historic (colonial) and First Nations heritage.
- Investment in on and off-site nature risk mitigation or controls, in accordance with GPT's natural capital accounts, and nature-risk and opportunity registers
- Invest in compensatory nature restoration projects aimed at offsetting GPT's negative nature impact profile, and
- Invest in additional, non-compensatory nature restoration projects that go beyond mitigating GPT's impacts, contributing to broader environmental sustainability efforts.

Leveraging our influence

GPT has participated in the Australian Government's TNFD pilot and provide early engagement on the TNFD framework.

We have engaged with external stakeholders, including tenants, suppliers, investors, and other industry professionals. We have participated in various events and initiatives, such as the Department of Climate Change, Energy, the Environment and Water Global Nature Positive Summit 2024, GBCA's Transform Conference and Nature Master Class 2024, and the UNGC's Biodiversity Networking Event 2024. Additionally, we have organised community planting events with Greenfleet, demonstrating our support of practical nature-based solutions.

Nature Roadmap

GPT is developing a roadmap to achieve positive outcomes for nature by identifying, assessing, and managing our nature-related dependencies, impacts, risks, and opportunities. To guide these efforts, we are using the TNFD 'LEAP' framework (Locate, Evaluate, Assess, and Prepare).

Through our Biodiversity, Climate, Water, and Resource Circularity policies, as well as our Reconciliation Action Plan, we carefully consider how we can support the property sector-relevant targets.

While initially planned for release in 2024, the roadmap's delivery has been postponed, allowing additional time for alignment with a broader range of environmental, regulatory, and stakeholder considerations.

For more details on GPT's nature-related goals, please refer to the TNFD section of our Sustainability Data Dashboard.

2012

Establishment phase

- GPT outlines climate and nature with biodiversity, climate and water policies.

2014

- Biodiversity assessment tools shared with GBCA.

2018

- Start partnering with Greenfleet for Biodiverse forest restoration carbon offsets.

2020

Assess and reset phase

- Commence asset-level biodiversity assessments and management plans.

2022

- Internal ecologist resource engaged.
- Sign Restoring Country for Climate partnership with Greenfleet.

2023

- TNFD pilot.
- Establish nature metrics and targets.
- Formation of natural capital accounts, identifying material areas of nature interface.
- Commence water master planning.

2024

Delivery phase

- Updated GPT's policy suite.
- GPT's first nature disclosure, which integrates TNFD, TCFD and ISSB.
- Formulate nature dependency, impact, and risk and opportunity registries.

2026

- Complete water and biodiversity management plans for all GPT owned and managed assets.

2028

- Progress report on nature and climate goals.

2030

Figure 3: GPT's Nature Roadmap highlighting key milestones and progress

L

Locate

Identify the firm's interface with nature

E

Evaluate

Consider nature dependencies and impacts

A

Assess

Material risks and opportunities

P

Prepare

Steps towards responding and reporting

Green Building Council Australia

Key assumptions and uncertainties

- Nature Data Sources and Reliability: GPT aims to clearly specify the resolution, accuracy, and original sources of all nature-related data used. Whenever possible, we strive to secure data at the highest practical resolution.
- Nature Targets: GPT is progressing toward nature targets such as reducing stormwater impacts and achieving net positive biodiversity by 2030. However, uncertainties remain due to potential shifts in environmental conditions, the effectiveness of mitigation strategies, and unforeseen challenges.
- Nature Initiatives: GPT is developing sustainability initiatives, but uncertainties related to financial, operational, and regulatory factors may influence the timing or execution of these efforts.

3.0 Strategy

GPT's strategic ambition is to be the leading diversified real estate investment manager in Australia, dedicated to delivering exceptional value, innovation and sustainable growth for our investors and stakeholders.

We own, develop and manage high quality retail, office and logistics assets, principally located in Australian capital cities and established regional centres and differentiate our business through our purpose of – Experience First.

Our practices in environmental and social sustainability not only enhance relationships with our customers, but also improve the resilience of our business. Climate and nature-related considerations and actions are embedded into our core business strategy and are important to GPT's strategic pillars.

The Strategy section of our Climate and Nature Disclosure Statement analyses the potential impacts of climate and nature on GPT's core business. We assess risks across our operations, including direct impacts, supply chain disruptions, and customer concerns. Climate change impacts are examined across different time horizons, considering both high emission and low emission scenarios. We evaluate the potential impacts of climate change on GPT's assets, encompassing physical risks such as extreme weather events and transitional risks stemming from policy shifts and market changes. Furthermore, we detail our assessment of nature-related risks and concerns in areas such as stormwater regulation, biodiversity impacts, and cultural heritage concerns.

Following this analysis, the strategy section outlines our strategies and objectives to reduce the impacts of our business on the environment. Throughout this section, we have grouped together climate and nature-related matters where they are congruent and outlined them separately where distinct processes are required.

The analysis concludes that while climate-related risks exist, they are not anticipated to significantly impact GPT's current business model or strategy in the short-to-medium term. For further detail on our climate related risks and our controls, please refer to Appendix A.

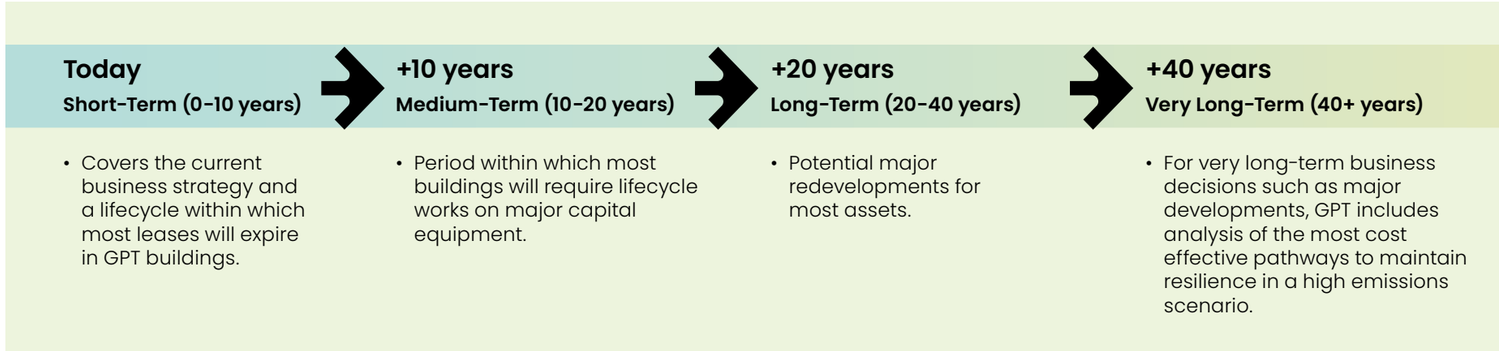


Figure 4: Commercial building lifecycle trigger points

3.1 Climate and nature impacts to GPT's core business strategy

For both climate and nature-related risks, we consider the potential impacts to our direct operations, upstream impacts to our supply chains and downstream impacts to our customers. These are all integrally linked to the ongoing prospects of our core business.

By proactively identifying and managing key risks and opportunities, including those related to climate change, biodiversity and water, we contribute to the creation and protection of value. By being informed about the external climate and nature-related matters, we are able to adapt our strategy to respond where necessary. Sections 3.1 to 3.5 of this Statement describe the potential impacts of climate and nature on GPT's core business strategy and our resilience to transition and physical risks in different scenarios.

For greater understanding, this section should be reviewed alongside the Climate and Nature Risk and Response tables in our Sustainability Data Dashboard.

3.1.1 Time horizons for climate and nature-related risks and opportunities

GPT's strategy to optimise our portfolio involves taking a long-term view of our assets, including our sustainability initiatives.

For climate scenario analysis, GPT considers our strategy and response to climate change impacts over the time horizons outlined in Figure 4. The time horizons are defined with reference to the typical lifecycle of our commercial buildings, which provides GPT with the flexibility to make decisions on an asset by asset basis depending on where each asset sits in its lifecycle, rather than taking a more simplistic portfolio-level approach towards evaluating risks and opportunities.

For example, when an established building is approaching a major redevelopment, we will consider undertaking a detailed physical climate risk assessment. The assessment includes developing design and construction responses to improve resilience to foreseeable physical risks over the next 50 years, being the period for which we would expect the major building elements to last.

In contrast, an asset built 15 to 20 years ago will be approaching mechanical plant replacement decisions. Our scenario-based climate risk assessment will focus on foreseeable risks to the operation of the new plant over the next 20 to 30 years, being the period for which it will be expected to service the building.

The physical climate risk assessment for a recently developed asset will focus principally on administrative and management controls to address current physical risks and maximise opportunities that arise from GPT's transition to a low carbon and nature positive economy.

Nature-related risks are mostly assessed over the short-term, in alignment with GPT's nature objectives, current business strategy and average lease terms. For more details, see Section 3.6.2.

Medium-term nature-related risk assessments consider our broader business model and sustainability initiatives to nature restoration. We cross reference the clear trends in environmental regulation and capacity constraints to understand the potential risks and dependencies that will become material to our business.

Long-term nature-related risks have been excluded from the current assessment due to the challenges in conducting nature-based scenario analysis with sufficient accuracy, including the use of natural capital accounting based modelling.

These timeframes are used throughout this Statement, including within the appendix where we reference specific risks and our responses.

3.1.2 Climate change global emissions scenarios to model future impacts

Emissions scenarios, or Representative Concentration Pathways (RCPs), are recommended by the Intergovernmental Panel on Climate Change (IPCC) and describe different climate futures with varied volumes of GHG emissions and provide guidance regarding the likelihood of physical and transitional risks being realised.

GPT has adopted two climate change emissions scenarios to model the potential future impacts of climate change on our business and the resilience of our strategy. The most significant impacts of climate change on GPT's business strategy are considered to be either, the physical impacts associated with high emissions under RCP 8.5 or, the transitional impacts of a low emissions economy under RCP 2.6. RCP 2.6 was chosen as the low emissions scenario as it supports the Paris Agreement goal of limiting global warming to below 2.0°C above pre-industrial levels and includes the goal of limiting global warming to 1.5°C within its margin of uncertainty (1.3°C to 2.4°C between 2081 – 2100).

Table 4: RCP 2.6 and RCP 8.5 details[1]

Low global emissions scenario	**High global emissions scenario**
RCP 2.6	RCP 8.5
Broadly supports the aim of the Paris Agreement targets to limit global temperature increases to below 2°C. Likely that global temperatures rise 1.2°C to 1.8°C by 2040, and between 1.3°C to 2.4°C between 2081–2100.	Likely that global temperatures rise 1.3°C to 1.9°C by 2040 and between 3.3°C to 5.7°C between 2081–2100.
Most ambitious global emissions mitigation scenario. In this scenario, transition impacts are the highest, with associated aggressive policy measures needed to reduce emissions quickly.	This scenario assumes there is no additional effort to constrain emissions, marked by significantly increased physical risks, resulting in dangerous climate change. Physical risks will be greatest and will accelerate in the medium, long and very long term.
• Policy and regulatory change • Changes to market expectations, economic disruption and impacts to reputation • Technology change	• Extreme hot days, heatwaves and rising average temperatures • Extreme weather events, including floods, severe storms and cyclones • Tidal inundation from rising sea levels • Bushfire
Potential future socioeconomic impact is mostly aligned with the Shared Socioeconomic Pathways (SSPs) SSP1 Sustainability scenario, in which a gradual but pervasive shift towards sustainable development occurs that respects environmental boundaries. Consumption is orientated toward low material growth and lower resource and energy intensity.	Potential future socioeconomic impact is closest to the SSP5 Fossil-Fueled Development scenario, in which the world emphasises competitive markets and technological progress which leads to rapid economic growth with energy intensive lifestyles and a strong reliance on fossil fuel energy powering this growth, at least initially.

1. Sources: IPCC, 2021: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, Cambridge University Press. In Press.

Earth Systems and Climate Change Hub. 2020. Scenario analysis of climate-related physical risk for buildings and infrastructure: climate science guidance. ESCC Hub Report No.21. Global Environmental Change 42 (2017), The Shared Socioeconomic Pathways and their energy, land use, and greenhouse gas emissions implications: An overview, Elsevier Ltd. Earth Systems and Climate Change Hub. 2020. Scenario analysis of climate-related physical risk for buildings and infrastructure: climate science guidance. ESCC Hub Report No.21. Global Environmental Change 42 (2017), The Shared Socioeconomic Pathways and their energy, land use, and greenhouse gas emissions implications: An overview, Elsevier Ltd.

Figure 5: GPT supports the effort to lower emissions by installing EV charging stations as seen here at 143 Foundation Road, Truganina, VIC

The scenarios shown on the left are used as a tool to test the resilience of GPT's core business strategy and to develop responses that address climate and nature-related risks and opportunities.

GPT acknowledges that uncertainty exists in the projections of both physical and transition climate risks. We have identified the highest concentration of uncertainty to be in emerging areas of technology and the most extreme weather events.

In our investment and management decision making, we consider:

- Potential physical impacts that could affect GPT's assets or the regions where the assets are located coupled with an asset's vulnerability to damage that limits capacity to operate, and
- Potential transitional impacts that could result from policy, regulatory, or technological change and shifts in market and stakeholder expectations (see Figure 5 for a technological change example of vehicle electrification).

In both cases, our investment and management decisions include processes and controls to consider, and mitigate if necessary, negative climate-related impacts and maximise potential opportunities to support long-term value creation. The case studies on our website provide insight into risk mitigation and opportunity maximisation.

Our investment and management decision making also considers other nature-related risks, dependencies and impacts as well as alignment with our biodiversity, water and human rights goals.

3.2 Climate change specific impacts to GPT's core business strategy

GPT has considered the risks and opportunities of acute and chronic physical climate change as well as the transition risks in relation to stakeholder expectations, technology and government policy and regulation. We assess our approach, using the governance forums we have established and input from external advisors, to maintain our strategy and understand where uncertainties lie so that assumptions are well grounded and current.

For further detail of GPT's climate-related risks and opportunities and GPT's strategy response, see our Appendix A.

In considering our business prospects in the context of climate change, no climate-related risks have been identified that we believe could have a material negative impact on our current business model or strategy in the short to medium term. Climate-related risks and opportunities have not affected our financial position, financial performance or cash flows for the 2024 year.

We have drawn this conclusion based on key attributes of our core business in two climate scenarios:

1. Fast transition (RCP 2.6 climate scenario)

GPT has undertaken detailed reviews of the potential impacts on our core business strategy of a fast transition to a low carbon economy. Our business resilience conclusions in this scenario are supported by the following:

- Our assets are primarily located in major Australian cities with diverse and growing economies, good infrastructure and stable governments
- Our revenue is not overly dependent on tenants in carbon intensive industries which may have reduced viability in a fast transition scenario
- GPT's Sustainability Team actively contributes to the decision making process of the GPT Investment Committee so appropriate mitigations are considered
- The majority of our operations are already carbon neutral certified through years of investment in efficiencies, shifting to renewable energy and an established offset plan for residual emissions, and
- We have invested in technology such as demand-side flexibility to reduce exposure to volatile energy markets as ageing fossil-fuel energy generators are retired without clear pathways to provide alternative firm energy supplies.

We are leveraging our decarbonisation knowledge to create opportunities that enhance our core business by:

- Creating strong business alignment with our customers and their own net zero journey. This alignment provides us with the ability to better service our customers' needs, with regards to emissions and reporting
- Generating energy savings. Energy is the second largest operational cost to our base-buildings. GPT's efficient buildings and in-house Building Performance Team help to generate significant annual savings when compared with operational energy intensity from our baseline year of 2005
- Generating income and operational cost savings through investments such as GPT's Smart Energy Hubs and our demand response LoadFlex program, which also support the energy grid
- Increasing investor appeal and opportunities for growing funds under management, by sharing similarities with our investors' policies and strategic interests
- Attracting, retaining and motivating staff who are aligned with our purpose, and
- Improving the terms and diversity of our debt through sustainable debt options.

2. Business-as-usual emissions (RCP 8.5 climate scenario)

GPT's climate strategy includes our Net Zero Plan to reduce our contribution to climate change and doing our bit to limit global warming to below 2 degrees Celsius above pre-industrial levels. However, we understand that the current international emissions trajectories have the possibility of an RCP 8.5 scenario of dangerous climate change and more than 4 degrees of warming by the end of the century. Our business resilience conclusions in this scenario are principally supported by:

- Physical climate change modelling across all of our assets which indicates that less than 3 per cent (by value) are in locations modelled with an overall value at risk (VaR) due to the physical impacts of climate change and between 0.2 per cent and 1 per cent (moderate risk), and no assets modelled as a high risk (greater than 1 per cent VaR)
- Our ongoing ability to adequately insure all assets at a reasonable cost
- Our portfolio of high quality assets is largely located in major capital cities and fast growing major regional economies which are less vulnerable to extreme climate change hazards due to regional climate risk mitigation and adaptation measures, and
- Internal processes requiring that all developments and lifecycle upgrades consider and respond to acute and chronic physical climate risk in design and investment decision making.

As a result of no material climate-related risks being identified that could have a negative impact on our current business model or strategy, there was no requirement to increase resourcing within the Sustainability Team to directly assist in climate-related risks, opportunities and targets in 2024.

3.2.1 Key assumptions and uncertainties in climate impact conclusions

The conclusions about the impacts of climate change are based on the assumption that any future assets that GPT acquires will have a similar risk profile to the existing portfolio. It also assumes that scientific updates in climate modelling will not introduce previously unknown risks or materially increase existing risk levels at our assets.

Uncertainty surrounding impacts of transition risks on our business and strategy are reduced by considering a low emissions scenario (RCP 2.6) resulting from a fast transition, whilst on the other hand uncertainty regarding physical impacts is reduced by utilising a high emissions scenario (RCP 8.5) resulting from a slow transition. If no risks are identified using these scenarios, we assume the risks would not appear using mid-range emissions scenarios, such as RCP 4.5 or RCP 6.0. However, the nature of a fast transition inherently includes larger changes to technology, market expectations and regulation and so there are inherent uncertainties as to exactly what these may look like and when they may occur.

To manage uncertainties and maintain reasonable assumptions, GPT regularly revisits risk assessments and resource allocation as outlined in this Statement. Changes to our risks and management responses are also updated annually.

42 Cox Place, Glendenning, NSW

3.3 Nature-related specific impacts to GPT's core business strategy evolution

GPT regularly assesses the risks, opportunities, impacts, and dependencies associated with nature-related physical constraints, stakeholder expectations regarding our environmental performance, and evolving government policies and regulations. Our strategy is designed to adapt to the changing landscape of nature-related challenges, so we remain agile in managing the environmental impacts of our operations while attracting tenants, investors, and resources, including funding, through the achievement of our nature goals.

To date, GPT has concentrated on assessing nature-related risks within our direct operations and upstream supply chains, including wood-based materials and utilities. Looking ahead, we aim to expand our assessment to cover the upstream impacts of steel, concrete, asphalt, and gypsum.

GPT's assessment of nature-related risks highlighted two potentially material risks to our core business strategy, primarily linked to our developments, which could have a minor to moderate impact on our direct operations in the short-term associated with stormwater and biodiversity. The costs of managing these nature-related risks have been included in the commerce for the existing development pipeline that is known to be affected and will be updated alongside all commercial modelling as the developments progress through the stages. These risks are also considered with respect to development delivery timelines and possible delays.

GPT's nature-related impacts stem from:

1. Stormwater Regulation

Increased regulation around stormwater management has impacted greenfield developments and operational assets. Key implications include:

- Higher costs for stormwater management and mitigation measures, as regulations mandate the detention of stormwater and the reduction of pollutants discharged into waterways, and
- An increase in operational costs over time due to levies for impermeable surfaces at our assets, driven by stricter environmental regulations.

2. Biodiversity Regulation

As part of GPT's strategic growth in the logistics sector, land acquisitions and developments in greenfield sites in Sydney, Melbourne, and Brisbane has exposed us to biodiversity-related risks. These include:

- Potential loss of biodiversity on some properties, which may result in additional costs for biodiversity offsets or delays in development due to regulatory scrutiny and conservation requirements. While these properties are located in designated growth corridors and have been rezoned for industrial use, the biodiversity risks require careful management to avoid delays and additional costs.

In addition to stormwater and biodiversity regulation, in 2024 GPT's assessment of nature-related risks highlighted a third potential risk of cultural heritage regulation, primarily linked to our developments, which could have a minor to moderate impact on our direct operations in the short term.

3. Cultural Heritage Regulation

Like biodiversity risks, certain GPT sites face cultural heritage risks, including potential impacts on heritage sites or objects, which could lead to regulatory delays or increased mitigation costs for new developments. Cultural heritage considerations require proactive engagement with stakeholders and regulatory authorities to effectively manage risks and compliance with relevant regulations. These controls are designed to mitigate potential impacts of cultural heritage risks on our core business strategy.

GPT's exposure to stormwater, biodiversity, and cultural heritage regulations, are also relevant to our ongoing operations but not considered material risk to our core business strategy.

The identified nature-related risks may have implications for our business, particularly in terms of development planning, and stormwater, biodiversity and cultural heritage management at operational assets. Where applicable, these risks will need to be considered in the business case for development assets, including financial forecasts, risk mitigation strategies, and engagement with regulatory bodies for compliance with stormwater, biodiversity, and cultural heritage regulations.

3.3.1 Key assumptions and uncertainties in nature impact conclusions

The conclusions about nature-related impacts on our business strategy are based on assumptions that the regulatory environment will maintain a similar trajectory of tightening regulation and that options for acquisition have a similar risk profile.

We acknowledge that there are uncertainties in the political environment that can influence this but looking ahead, a broader range of nature-related risks may emerge that require a response from GPT. These risks could relate to further tightening of environmental regulations, shifts in stakeholder expectations, and the need for enhanced sustainability practices across our portfolio.

Early identification and planning for these risks are key to minimising their potential impact on our operations, so that we can remain resilient in the face of changing environmental and regulatory landscapes. However, we also acknowledge that there are uncertainties in the identification processes that can only be resolved through the detailed planning stages of our developments. For example, the full extent and significance of biodiversity on a site can only be determined through ecological surveys or the full extent and significance of cultural heritage may not be understood until excavation activities are undertaken. These may not be possible during due diligence periods which require uncertainties to be resolved during the design and planning stages later.

For further detail on our short-to-medium term nature-related risks and opportunities, and GPT's strategic response, see Appendix B.

3.4 Understanding climate risks at an asset level

The majority of assets in our portfolio are located in cities and urban areas, as shown in the illustration on page 18, places identified as having a high capacity to adapt to climate change from a socio-economic perspective. Assets located in these areas are more likely to be resilient to the risk of becoming stranded or impacted by decreasing values as a result of climate change.

In line with climate change adaptation guidance, GPT conducts due diligence, including climate-related risk assessments, when making decisions on acquisitions and developments. For example, flood risk is scrutinised for all assets, and in the past has resulted in GPT not acquiring assets due to either the elevated risk of flooding, or actual historical flood events impacting a site. GPT also analyses changes over time of climate hazards informed by detailed modelling, for example a 1 in 100 year flood zone may become a 1 in 20 year flood zone in future decades. Urban and industrial areas may also already have existing flood mitigation infrastructure. However, GPT will still consider how flooding may directly and indirectly impact an asset.

Despite having a majority of assets in low transition risk areas, acute and chronic physical risks of climate change still exist, such as extreme heat, severe storms and in some cases flooding. However, through considering climate related risks in the due diligence process, and adapting to inherent localised risks, we have reduced our vulnerabilities.

3.4.1 Concentration of GPT's physical climate change-related risks

Listed in the table below are the regional areas where climate physical risks are concentrated, which portfolio is the most exposed and what actions have or are being implemented to reduce or eliminate our vulnerabilities.

Table 5: Concentration of acute and chronic climate-related risks by region, adaptations and mitigations, and opportunities

Physical risk	Concentrated risk region	Portfolio	Adaptation or mitigation implemented	Resulting opportunities
River flooding A	**Brisbane CBD**	Office	Brisbane River flood barrier system installed at Riverside Centre and One One One Eagle Street.	Continued operation with minimal tenant disruptions in flood events as evidenced by the 2022 flood.
River/creek flooding A	**Western Brisbane, Western Sydney, Greater Melbourne and Adelaide**	Logistics	Due diligence throughout the acquisition and/or development process to specifically consider flood impacts, including on building design.	Increased likelihood of continued operations during times of heavy rain and flooding of local waterways.
Severe storms A	**All regions**	Office, Retail and Logistics	In design and at life cycle upgrade opportunities, our assets undertake climate adaptation planning, including upsizing hydraulics to account for increased severity of storms.	Continued operations during times of severe storm activity.
Tropical cyclones A	**Townsville**	Logistics	Asset designed and built to wind speeds specific to the region. Not located within area at risk of storm surge and tidal inundation.	Continued operations following the passage of a tropical cyclone.
Increasing average temperatures, extreme hot days and heatwaves A C	**All regions**	Office, Retail and Logistics	Climate adaptation planning, including passive cooling techniques, installing better plant technology and implementing energy efficient procedures.	Creating conditions where customers and tenants remain comfortable during hot periods, while maintaining energy costs.

Physical risks: acute vs. chronic risk

A **Acute risk:** Shocks, event-driven risks such as increased severity of cyclones, floods and other extreme weather events.

C **Chronic risk:** Stresses, longer-term shifts in climate patterns that may cause sea level rise, increased frequency of heatwaves and changes in rainfall patterns.

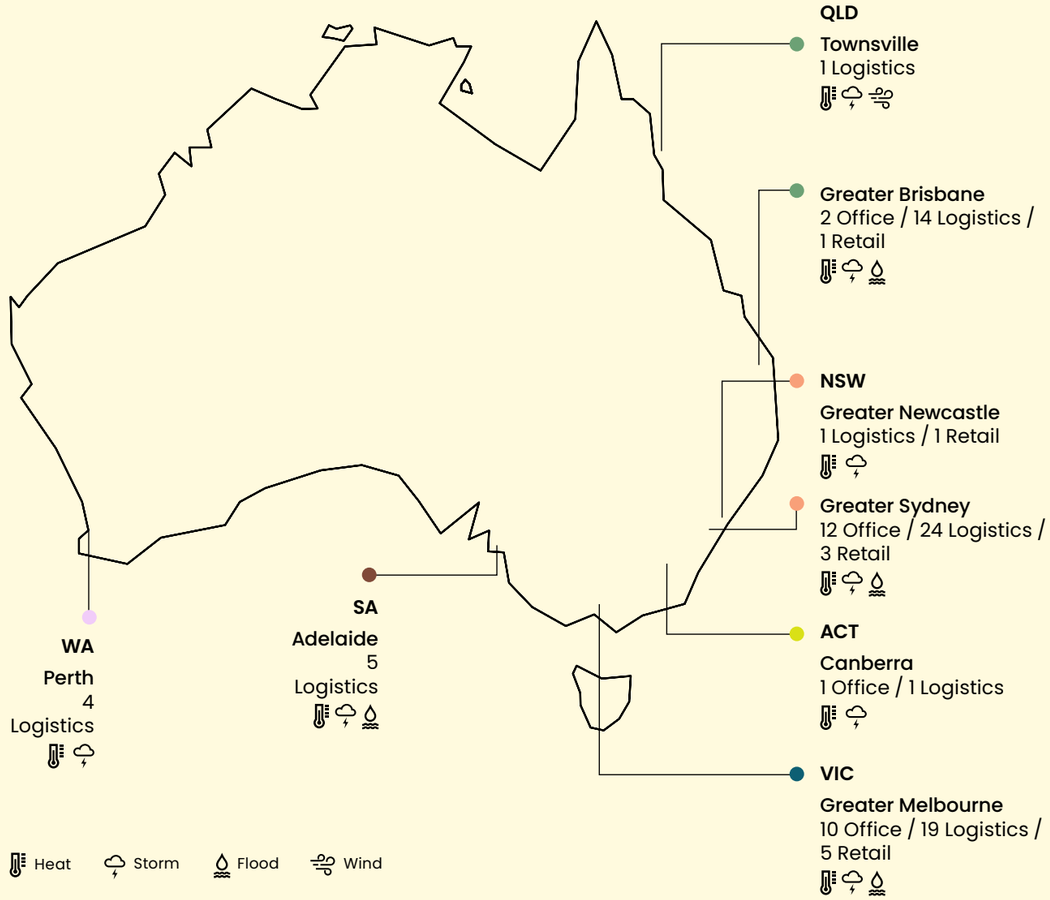


Figure 6: GPT's investment portfolio assets by region with associated physical climate risks. Data as at 31 December 2024.

3.4.2 Climate adaptation planning triggers

GPT's climate adaptation planning process is integrally linked to our business and asset lifecycles so that informed decisions are made. Key decision making points include:

- Review of climate risks and opportunities during acquisition due diligence so that our investments are within our long-term sustainability risk appetite
- Development planning incorporates long term climate modelling to build resilience to foreseeable climate impacts, and
- Major capital works and lifecycle upgrades consider the potential change in physical conditions and transition risks that need to be managed over the full lifecycle of that particular element of the asset.

For more detail on the acute and chronic physical risks GPT assesses, see the TCFD tab on our Sustainability Data Dashboard.

3.4.3 Direct and indirect climate risk mitigation and adaptation efforts

In our efforts to assist decarbonisation and increase resilience to impacts of climate change, GPT considers both direct and indirect mitigation and adaptation strategies that can be implemented now and in the future. Asset-level climate adaptation plans also address direct and indirect risks and opportunities across multiple time horizons.

Direct mitigations cover our own business operations. For example, installing solar arrays on asset roofs to reduce emissions and save on energy costs addresses both the risks of a disorderly transition on energy prices and the need for more energy in a scenario with increasing temperatures. Electrification of our assets, including future proofing our logistics assets for EV charging, is a direct mitigation and adaptation effort to address transition risks and opportunities as we move towards a low carbon economy and away from petrol and diesel transport.

Indirect mitigations include considering upstream impacts to our suppliers and downstream impacts to our customers and the communities that we serve. For example, how climate change may alter local population growth or business prospects in future years and how this would impact revenue for our assets.

3.4.4 Climate modelling

GPT procured physical climate modelling for all our assets from XDI (Cross Dependency Initiative) in 2022 and we continue to use this modelling to inform our climate risk vulnerability assessments and adaptation planning. The modelling provided by XDI uses the RCP 8.5 global warming scenario, and downscales climate change projections to an asset level so that we can use them to identify and treat hazards now and in the future. The high resolution modelling then allows us to take a 'bottom up' approach to climate adaptation planning and reducing vulnerabilities at an asset level.

The modelling for each asset shows how a potential hazard's risk level changes over time, projected over the long term. For key assets, XDI has provided large site analyses, which is a more detailed analysis of direct physical climate risk within an asset's boundary, as well as the surrounding area, to capture any indirect risks that could impact the asset. The modelling is incorporated into our climate adaptation planning process.

To make well-informed investment decisions, we consider future-proofing strategies for our assets. For example. when replacing air-conditioning plants, we focus on elements that contribute to a fast transition, such as energy efficiency, low-emission refrigerants, flexible operations and electrification.

Our climate scenario analysis also helps us identify future asset needs. If an air-conditioning unit requires a future upgrade to meet increased cooling demands, we will typically schedule the upgrade for its next lifecycle replacement, rather than making expensive upgrades now. This way our investments respond appropriately to business needs while minimising unnecessary expenditure.

For more about our adaptation strategies for key transitional and physical risks, see the Risk Analysis and Mitigations tabs on our Sustainability Data Dashboard.

3.4.5 Carbon price considerations

GPT's core business is not highly exposed to international markets and our climate response has resulted in a low emissions profile for our business. As a result, there is currently only limited exposure to a price on carbon through schemes such as the European Emissions Trading Scheme which has already traded at over AU$100 per tonne of GHG emissions (tCO_2e). However, there are some cost premiums associated with GHG emissions reduction in Australia, including mandatory renewable energy purchases and supply chain cost impacts through suppliers that fall under the national Safeguard Mechanism, as well as the voluntary action taken by GPT in order to deliver on our policy goals which aim to contribute to limiting global warming to well below 2 degrees Celsius above pre-industrial levels.

Retail electricity contracts in Australia require a mandatory percentage of renewable energy through the purchase and retirement of renewable energy certificates. Over and above the mandatory requirement, GPT strives to utilise 100 per cent renewable electricity. While the cost premium for renewable energy in Australia has increased, GPT's renewable energy certificate contract, signed in 2020 and valid through 2030, has largely protected GPT from these price hikes. By comparison to standard retail electricity contracts, our 100 per cent renewable energy contract is projected to save approximately AU$2 million over its term.

Carbon offset prices in Australia have also risen over the past few years with potential to continue rising. Our offset strategy results in an effective carbon price of AU$30/t out to 2027. Beyond 2027, our strategy is to continue our preference for direct investment in Australian reforestation projects, where feasible. In 2024, the total cost of offsets[1] at GPT to deliver on our net zero strategies for corporate operations, building operations and upfront embodied carbon neutrality was $800,000.

For further information on GPT's offset strategy, see our sustainability website.

1. Both certified offsets and offsets from Australian forest restoration projects.

3.4.6 Climate impacts on valuations and financial reporting

Our review processes and response to climate-related risks embeds climate-related financial impacts on our assets in forward-looking capital and operational savings and costs. These savings and costs are provided to independent valuers for their consideration in conducting asset valuations, with GPT's standard valuation instruction letter which includes a requirement for the valuer to consider the effects of climate change. The costs and savings associated with the climate response activities outlined in this Statement and our case studies are embedded within GPT's financial statements and asset valuations and should not be considered additional financial disclosure.

While GPT does track costs that are flagged to deliver climate-related benefits, currently we do not do this in isolation, in recognition of the fact that this expenditure will also deliver other benefits (e.g., greater durability, improved quality, operational reliability and reduced safety risk). By taking this approach, GPT avoids the risk of overstating the contribution of climate-related issues in expenditure decision making.

For project-by-project insights into the impact of climate-related decisions, see our case study library.

3.5 Understanding nature interfaces at an asset level

In accordance with the TNFD's Locate phase, GPT assesses nature interfaces, along with the nature-related dependencies and impacts, associated with our assets. This approach incorporates biodiversity, stormwater, and heritage considerations at the asset level for a thorough evaluation of both environmental and cultural factors. GPT's nature interface for all owned and managed assets is made publicly available through our Nature Interface and Sustainability data dashboard. A summary of GPT's most material nature interfaces is outlined below.

3.5.1 Understanding biodiversity dependencies, impacts, and risks at an asset level

We recognise the importance of understanding and managing the biodiversity dependencies, impacts, and risks associated with our assets. Currently, 54 of our assets are situated in areas of significant biodiversity value, where ecological communities are likely to be present on or adjacent to the asset. These assets are prioritised for biodiversity assessments, so that we can adopt a tailored approach to manage and mitigate biodiversity-related risks, where possible. An example of this analysis is provided in Figure 7.

Our goal is to avoid, mitigate, and offset biodiversity impacts through a framework that supports the aim of the Green Building Council of Australia's Building with Nature Principles and Targets. This approach integrates biodiversity considerations at the asset level, so that dependencies and risks can be assessed within their local context. This includes evaluating adjacent ecosystems and upstream activities that may influence the asset's environmental footprint.

For new developments, GPT prioritises the incorporation of biodiversity objectives, including:

- Sustainable sourcing of materials, such as timber, in line with biodiversity standards
- Aligning, where feasible, with the environmental objectives and goals of regional environmental planning schemes
- Integrating biodiversity considerations into our aims for carbon neutrality and water sustainability, and
- Engaging with First Nations organisations and Traditional Owners to incorporate cultural heritage and place-led design opportunities.

For our operational assets, GPT takes a proactive approach to managing biodiversity risks and promoting sustainability, including:

- Responsible sourcing and management of materials used in asset operations
- Evaluating infrastructure and operational system upgrades to enhance environmental outcomes, such as energy efficiency, water conservation, and waste management
- Implementing advanced stormwater management practices to reduce pollution runoff and protect local ecosystems
- Partnering with local and regional initiatives to support natural habitat conservation, and
- Engaging with supply chains, tenants, and industry groups, including First Nations organisations, to raise awareness of biodiversity risks and opportunities and encourage sustainable practices.

3.5.1.1 Addressing unavoidable impacts

We recognise that the expansion of our business, particularly into greenfield sites, will lead to unavoidable biodiversity impacts. These impacts can include:

- Direct impacts such as habitat loss and fragmentation, and pollution from air, water, noise, and light
- Indirect impacts such as encroachment on natural habitats and changes to surface hydrology
- Cumulative impacts including the loss of regional biodiversity and a decline in ecosystem services like pollination, water purification, and carbon sequestration.

In such cases, GPT works closely with stakeholders to implement solutions that meet regulatory requirements, including biodiversity offset strategies, habitat restoration projects, and other proactive measures designed to effectively compensate for these environmental impacts.

Figure 7: Example spatial analysis illustrating GPT's interface with areas of high biodiversity value

3.5.1.2 Decarbonisation and biodiversity co-benefits

From GPT's perspective, our carbon strategy aligns with our values, nature impact profile (impacts to climate, land, freshwater, ocean, and biodiversity, of which people are a part), and accepted carbon offset definitions and standards, which are summarised in the below section 3.6.1.3 Carbon Offsets Strategy. A key element of our broader decarbonisation strategy is investing in Australian reforestation projects that deliver multiple co-benefits to offset our residual emissions, including biodiversity restoration and supporting First Nations land rights.

3.5.2 Understanding stormwater dependencies, impacts, risks and opportunities at an asset level

Among GPT's assets, 38 are in areas sensitive to stormwater discharge — both in terms of flow and pollutants (assets which discharge to state, national or internationally significant waterways or wetlands). These assets are prioritised for further stormwater assessments to guide effective management strategies. For details, see Figure 8.

GPT employs a three-step process for mapping the stormwater interface: asset surface classification, stormwater flow and quality assessment using MUSIC (Model for Urban Stormwater Improvement Conceptualisation), and assessing stormwater assets alongside the hydrological sensitivity of receiving environments.

Through our comprehensive desktop analysis, we were able to classify key asset surfaces into categorise such as permeable surfaces (i.e., soil, rock, mulch, or vegetation), ground-level car parks, rooftop car parks, and roof top areas. These classifications were based on pollution types and impact profiles, with ground-level car parks exposed to pollutants from varying vehicle traffic and loading docks, while rooftop car parks and rooftops were primarily affected by small vehicle traffic and atmospheric pollutants, respectively. This asset surface classification enabled GPT to model both pre-development and post-development scenarios to assess exposure to stormwater flow and pollutants, and effectiveness of various stormwater controls. Key parameters assessed included annual flow, total nitrogen, total phosphorus, and total suspended solids.

Mapping asset interfaces is crucial for effective near-site water management, as it improves understanding of the relationships between assets, stormwater, stormwater infrastructure, and local ecosystems. This mapping aids in identifying vulnerable downstream ecosystems, such as Ramsar wetlands, enabling targeted mitigation and restoration efforts. Additionally, clear visual representations foster collaboration with stakeholders and regulatory agencies, raising awareness of the importance of stormwater management and promoting initiatives aimed at improving water quality.

Figure 8: Example spatial analysis depicting GPT's stormwater total nitrogen discharge in relation to RAMSAR-designated catchments – wetlands of international importance

Figure 9: Example spatial analysis showing GPT's interaction with areas of significant heritage value

3.5.3 Understanding heritage dependencies, impacts, and risks at an asset level

Among GPT's current assets, 60 are recognised for their heritage significance or sensitivity, encompassing areas, artefacts, or infrastructure of First Nations or colonial heritage value. These assets are prioritised for heritage assessments and management plans to facilitate effective stewardship. For an example of this interface , see GPT's Nature Interface web map, Sustainability dashboard, and Figure 9.

In managing heritage risks, GPT focuses on several key actions. In NSW we proactively identify heritage-listed sites and conduct heritage impact assessments to understand potential effects on areas of cultural significance. In Victoria, we assess heritage listings, apply for necessary planning permits, and prepare statements outlining any potential impacts on heritage values. In Queensland, we identify heritage places and evaluate the implications of proposed developments, seeking approvals from the Queensland Heritage Council when required. By prioritising these actions, GPT aims to minimise adverse impacts on heritage while enhancing the value of our projects.

GPT also engages First Nations stakeholders to inform the design and delivery of developments and refurbishments, which can include building design, cultural storytelling and language, material selection and landscape management. In NSW, to embed First Nations engagement into project governance processes, and cultural knowledge into the built environment, we adopt the 'Connecting with Country' framework, a holistic approach that prioritises cultural heritage and environmental stewardship on relevant projects. This fosters partnerships between First Nations peoples, government, and other stakeholders to promote cultural heritage, land management, and biodiversity conservation.

A notable example is the Restoring Country for Climate project, where GPT secured 500,000 tonnes of carbon offsets through reforestation and restoration efforts in collaboration with Greenfleet, Noosa Landcare, and the Kabi Kabi People's Aboriginal Corporation. This initiative combines environmental restoration with the revitalisation of First Nations cultural practices, knowledge, and land sovereignty.

From an asset-level perspective, engaging First Nations land management in these restoration projects highlights a deeper understanding of heritage dependencies, impacts, and risks. Preserving cultural heritage through land restoration goes beyond environmental outcomes, addressing the risks of cultural erasure, environmental degradation, and the loss of traditional knowledge. By partnering with First Nations communities, GPT recognises the interconnectedness of environmental and cultural heritage, so that both are protected and revitalised for future generations. This approach emphasises the importance of culturally informed, collaborative management to reduce long-term risks and deliver sustainable outcomes for both the land and the people.

3.5.4 Concentration of GPT's nature-related risks

Listed in the below table are the regional areas where nature (excluding climate change-related) physical risks are concentrated, which portfolio is the most exposed and what actions have or are being implemented to reduce or eliminate our vulnerabilities.

Table 6: Concentration of nature-related risks by region and mitigations and opportunities

	Risk type	Risk description	Portfolio and risk region	Adaptation or mitigation implemented	Resulting opportunities
Physical Risk	Supply chain	Bushfire, flood, cyclone, and severe drought causing supply chain constraints and support service (transport, storage and production facility) restrictions.	Office, Retail and Logistics – All regions	Due diligence throughout the acquisition process considers supply chain sensitivity to bushfire, flood and cyclone impacts. Creation of long-term contracts and continued support to supply chain and community partners.	Reduced exposure to operational disruption and goods and services market volatility.
Transition Risk	Policy and Legal	Increasing compliance conditions and costs towards meeting strengthened flora and fauna regulations	Logistics – Western Melbourne, Western Brisbane, Western Sydney	Due diligence throughout the acquisition process considers flora and fauna impacts, and exposure to flora and fauna regulations. Asset-level biodiversity assessment and management plans.	Reduced exposure to operational disruption and flora and fauna regulatory conditions and cost.
		Increasing compliance conditions and costs towards meeting strengthened water regulations.	Logistics – All regions	Due diligence throughout the acquisition process considers exposure to water regulations. Asset-level water master plans.	Reduced exposure to operational disruption and water regulatory conditions and cost.
	Market/Reputation	Increasing operational and capital expenditure driven by supply chain constraints, services restrictions, and changes in market demand (e.g., increased demand for renewable energy, solar panels, carbon offsets, low-carbon concrete and steel, and FSC timber).	Office, Retail and Logistics – All regions	Creation of long-term contracts and continued support to supply chain and community partners.	Reduced exposure to goods and services market volatility. Increased market share and interest from ESG responsible tenants and investors.

3.6 GPT's climate and nature specific strategies

GPT has strategies that specifically respond to climate and nature-related challenges while also supporting our business values and purpose. Our plan for transitioning to a low carbon economy and a nature positive future includes:

- Addressing the shift to a net zero economy and targets an overall positive outcome for nature that halts and reverses biodiversity loss
- Contributing to an orderly and just transition by supporting our stakeholders and communities to transition to a climate-resilient and nature positive economy
- Meeting investor and customer expectations around decarbonisation and positive outcomes for nature, and
- Improving the overall sustainability of GPT's business.

3.6.1 GPT's decarbonisation climate strategy

GPT has adopted a decarbonisation strategy to support the aim of the 2050 net zero target set by the Paris Agreement. Our early engagement aims to support the goal of limiting global warming to below 2 degrees and provides several potential benefits for our business strategy, including:

- Supporting internal capabilities to identify and manage transition risks
- Strengthening our customer offering and reputation, resulting in increased loyalty and long-term value creation, and
- Enabling sustainable financing.

3.6.1.1 Delivering our Net Zero Plan with carbon neutral milestones

Carbon neutral certification milestones are key to GPT's Net Zero Plan. We have identified and acted on the three key material activities that result in emissions under our control:

- Corporate operations
- Building operations, and
- Upfront embodied carbon from developments.

GPT's corporate operations have been carbon neutral certified since 2011.

GPT commenced a program of certifying our base building operations in 2019, and **delivered on our** target of certifying all of our operationally controlled assets held for investment purposes by the end of 2024. We are also working with our co-owners to certify assets under their operational control by 2030.

The third material source of emissions that GPT has principal decision making authority over is upfront embodied carbon emissions from our developments. In 2022, GPT delivered Australia's first Active carbon neutral certified development and our target is to deliver all future GPT developments as upfront embodied carbon neutral.

Credible independent certification of net zero achievements from NABERS and the GBCA provides greater certainty and transparency of an organisation's net zero journey rather than self-validation of results. Both methods utilise established external ratings as part of the certification process and require demonstrated carbon neutral operations or upfront embodied carbon outcomes before the certification is issued. Additionally, independent validation means that requirements are well understood, actually delivered and underpinned by reputable, external standards.

GPT's decarbonisation strategy is increasingly focused on supporting our supply chain and tenants to reduce their emissions. For example, we act to support our tenants through actions such as offering solar arrays offered to assist them in reducing their emissions.

Our strategy fosters resilience, not only against future physical climate-related risk, but also in establishing a high level of preparedness for a transition to a low carbon economy. The insights from our decarbonisation journey will stand us in good stead as we turn our focus to delivering on our nature-related targets.

3.6.1.2 GPT's Offset strategy

GPT conducted extensive due diligence in our offset selection process during the formative planning period for our Net Zero Plan in 2017 and 2018. It was clear that offsets would be required as a part of our decarbonisation strategy to achieve our carbon neutral ambitions. The aim was to establish an offset strategy that would provide reliable supply, cost, and quality. Offsets are to be used for residual emissions that can't be feasibly reduced or eliminated through other means.

GPT recognise that there is still significant variability and risk in the type and quality of carbon offsets available within compliance and voluntary markets. To effectively mitigate our risks, we applied the following criteria in our offset selection process:

- Real, from processes that are genuine and not overestimated, with tangible results. Transparent and independent validation or assurance is important
- Additional, from GHG reductions that would not have occurred in the absence of a market for offset credits
- Not associated with environmentally damaging processes, such as landfills, mining or plantings that conflict with the natural ecology
- Of long duration or permanence (GPT targets 100 years of protection for projects), and
- Avoid double counting, where two parties claim the same carbon removal or emission reduction.

GPT's environmental policies support a preference towards carbon removal projects as well as prioritising projects with multiple co-benefits across our different sustainability priorities.

From 2019 to 2024, for every 1 tonne of residual carbon emissions GPT has applied 1 tonne of Verra certified offsets and a further 1 tonne of offsets from Australian forest restoration projects. This is a conservative approach that provides additional certainty of meeting our carbon neutral goals.

We have a partnership with Greenfleet and support the Restoring Country for Climate project through this partnership which aims to restore close to 1,000 hectare of biodiverse native forests in the Noosa Hinterlands, on the lands of and also in partnership with the Kabi Kabi People Aboriginal Corporation.

See the GPT Offset case study on our website.

3.6.2 GPT's nature-specific strategies

As a developer and manager of commercial assets, GPT acknowledges that through developing and managing commercial assets, our business displaces natural habitats and disrupts provisioning, regulating, and supporting ecosystem services upon which our business, society, and nature depend. This includes both our direct activities and broader upstream and downstream processes, particularly in areas of water and climate sensitivity. It also includes activities within regions that depend on or impact areas of high biodiversity significance, including those with nationally and state-legislated ecological communities and species, as well as areas protected under International Union for Conservation of Nature (IUCN) categories I-IV.

GPT aims to manage, where feasible, the negative effects on nature and mitigating nature's decline to support positive outcomes for nature. GPT is actively identifying, evaluating, assessing, responding to, and disclosing our dependencies, impacts, risks, and opportunities in accordance with the TNFD's LEAP (Locate, Evaluate, Assess, Prepare) assessment framework.

The TNFD LEAP framework helps GPT identify and understand our nature-related dependencies, impacts, and risks, which are essential for achieving positive outcomes for nature. By following the LEAP approach, GPT can locate where our operations intersect with nature (including ecosystems, species, and protected areas), evaluate how these operations affect or rely on natural capital, and assess the associated risks and opportunities. The LEAP framework allows GPT to assess our direct and indirect impacts on areas of high biodiversity significance, including regions with nationally or state-legislated ecological communities, and those designated under IUCN categories I-IV. Through this process, GPT can prioritise the protection and restoration of biodiversity in critical areas, actively work towards reducing habitat displacement, and implement measures to reverse biodiversity loss, in turn contributing to the broader goal of achieving a positive outcome for nature. Additionally, by tracking material dependencies and impacts through natural capital registers and establishing specific biodiversity targets, GPT can monitor progress, so that our business activities contribute positively to climate, biodiversity, and water goals.

To establish a clear baseline for tracking and managing nature-related impacts, GPT has prioritised securing data from 2020 wherever possible. Where historical data availability is limited, we will use 2023 as the baseline year for emerging metrics. By setting specific nature-related metrics and targets in accordance with the TNFD's guidelines, we provide stakeholders with clear benchmarks to assess our progress towards achieving nature goals. In the initial phase, our nature-related assessments will focus on direct operational impacts. Upstream and downstream supply chains will be excluded from the initial scope of assessment. This strategic approach allows us to concentrate on areas where we have the greatest control, accountability, and access to relevant data.

We will also work with our suppliers and tenants to establish understanding of nature dependency and impact pathways. Nature dependency and impact pathways are an emerging area and GPT will transparently disclose our progress and learnings as we increase our maturity in this space.

For further information, see our Nature Roadmap on page 13.

3.6.2.2 Key nature considerations

To achieve a positive outcome for nature, we will continue to work to extend the application of the Mitigation Hierarchy, an internationally recognised tool traditionally focused on avoiding, mitigating and offsetting biodiversity impacts, by:

1. Broadening impact assessment towards nature-based impacts (not solely biodiversity)
2. Including activities that impact nature beyond the individual project scale, including direct and indirect historical and systemic drivers of nature-loss, and
3. Targeting nature net gain requirements across entire value chains and financial portfolios.

In undertaking this work, we will prioritise that:

1. 'Natural capital accounts' adhere to strict data integrity and quality assurance standards, including reliability and source
2. 'Natural capital' data is secured at the finest resolution and scale practicable, and
3. Residual compensatory actions and offsets strictly adhere to exchange rules that are respectful of the non-fungible quality of various natural capital asset classes (e.g. non-tradable quality of ecological communities and species).

3.6.2.3 Natural capital dependency register

A natural capital dependency is a businesses positive or negative reliance on natural capital. As GPT seeks to identify material impact and dependency pathways, we have started developing a natural capital dependency register.

GPT's natural capital dependency register lists the natural capital we depend upon, either directly for our activities and operations or indirectly through our value chain or financing activities. The dependency register also depicts results relevant to the dependency. Examples of dependencies that are material to GPT's business are availability of appropriate land to meet development demands, fresh water to meet asset needs, the availability of materials for developments and the ability for the surrounding landscapes and waterways to receive our stormwater.

Dependencies are usually thought of as 'positive' in the sense that a business depends or relies on the presence of natural resources, ecosystem services or sets of environmental conditions that are beneficial for the business. However, an organisation may equally depend on the absence or relative infrequency of natural resources, ecosystem dis-services or environmental conditions that are harmful. Both positive and negative dependencies will be recorded in the GPT natural capital dependency register.

3.6.2.4 Natural capital impact register

A natural capital impact register lists the natural capital that a business affects, either directly through its activities and operations or indirectly through its value chain or financing activities. The material potential impacts of our business consider the significance and scale of environmental impacts, compliance issues and community expectations. These impact areas often also indicate associated business risk exposure that we need to mitigate. Examples of potential material natural capital impacts include displacement of ecological communities of national significance, discharge of stormwater into sensitive waterways and impacts to sites of cultural heritage.

The natural capital dependency and natural capital impact registers' combined will assist GPT in understanding and identifying relevant ecosystem services that we depend upon or impact. Understanding our relationship with nature identifies the potential risks and opportunities for our business which ultimately results in a well informed and effective strategy.

For details on how GPT is currently addressing, or plans to address, both existing and potential climate and nature-related risks and opportunities, refer to Appendix A and B, and the Sustainability Data Dashboard.

3.6.2.5 GPT's application of the TNFD LEAP Framework

GPT has adopted TNFD's LEAP Framework approach in order to conduct the due diligence necessary to inform our nature-related risk, dependencies, impacts and opportunities and to assist with developing our disclosure statements in accordance with the TNFD recommendations.

There are five phases of the LEAP approach:

1. Scope the organisation's approach towards locating, evaluating, assessing and responding to material nature-related dependencies, impacts, risks and opportunities
2. Locate your interface with nature
3. Evaluate your dependencies and impacts on nature
4. Assess your nature-related risks and opportunities, and
5. Prepare to respond to nature-related risks and opportunities and to report on your material nature-related issues.

In order to understand our impact and dependencies on nature, GPT has commenced:

- Reviewing our procurement policies and our approach to the use of chemicals to align with our Biodiversity, Water and Materials and Recovery Policy
- A stormwater pilot project to improve resilience to drought and flood and other impacts of climate change. For more details, see stormwater pilot case study on our website
- Geographic information system mapping services to assess assets that are located within water-sensitive environments, and to determine the amount of green space and impervious surfaces and roof surfaces to inform potential rainwater capture
- Location based assessments of our dependencies and impacts on nature, including location based biodiversity assessment of operating shopping centres, acquisitions and developments, and
- Assessing and establishing nature-related metrics and targets.

Highpoint Shopping Centre, VIC

4.0 Risk Management

Effective risk management is fundamental to GPT's ability to achieve our strategic and operational objectives. By understanding and managing risks and opportunities, we can create and protect enterprise value and provide greater confidence for our stakeholders.

GPT's climate and nature-related risks are assessed and managed within our enterprise-wide Risk Management Framework to support business resilience. The Risk Team oversees the Risk Management Framework and assists in the identification, assessment, treatment and management of risks across the organisation. The Risk Team supports the Executive Team, the GPT Board, the GPT Funds Management Board, and their respective committees in effective oversight of risk management.

We use our Risk Management Framework to identify, assess, and prioritise climate and nature-related risks and opportunities, evaluating their strategic, financial, and reputational impact. Material risks and opportunities are reviewed by GPT's Sustainability Steering Committee and recorded in the Climate and Nature Risk and Opportunity Register, alongside corresponding mitigation strategies. Residual risk ratings are then assigned, and further mitigation plans are developed.

Sustainability risk metrics (including climate risk) are included in GPT's Risk Appetite Statement for existing portfolios and new asset acquisitions.

GPT applies a 'double materiality' approach to assess climate and nature-related risks. This means we consider both the financial impacts of climate change and nature degradation, as well as the environmental and societal impacts of our operations.

By considering climate-related risks, GPT takes actions to mitigate the impact of both transitional and physical hazards on our business operations. This enhances our resilience to acute, event-driven shocks, such as extreme weather events (e.g., storms, cyclones and floods, heatwaves or blackouts and load shedding), as well as chronic stresses from longer term shifts in climate patterns (e.g., rising sea levels, more frequent heat waves, or increasing energy supply disruptions).

Under the ASRS, materiality is grounded in decision-usefulness of the information for primary users. In assessing materiality of information about climate and nature-related risks and opportunities under AASB S1 and AASB S2, GPT considers, amongst other things, the range of possible outcomes and the likelihood or the possible outcomes within that range and in that context considers the magnitude and likelihood of the financial impact of the risks and opportunities.

For more detail on how climate and nature-related risks are prioritised and our materiality assessment, see our sustainability website.

4.1 Integrated approach to climate change and nature risk management

GPT considers both transitional and physical climate risks as part of our integrated approach, including asset acquisitions and divestments, existing asset lifecycle upgrades, and new developments. Transition risks may directly or indirectly impact our business resilience in the short to medium term, while physical risks can have long-term implications.

To assess and manage these risks we use our Risk Management Framework to identify, assess, and prioritise climate and nature-related risks and opportunities, considering factors such as strategic, financial, and reputational impacts. Material risks and opportunities are reviewed by GPT's Sustainability Steering Committee and recorded in a Climate Risk and Opportunity Register, and a Nature Risk and Opportunity Register and treatment plans to mitigate or manage the risks, or optimise the opportunities are developed. Residual risk ratings are then established and mitigation plans are developed.

Climate change and nature based risks and impacts are integrated into our decisions-making processes, including for existing portfolios and new asset acquisitions. These decisions include consultation with the Sustainability Team having reference to policies such as our Biodiversity and Water Policies and risk appetite statement metrics. These metrics include identification of assets which may be vulnerable to climate change impacts in the long-term. Periodic reviews are conducted by GPT's Executive Team (ET) and the Audit and Risk Committee (ARC). GPT's risk appetite is considered in all decisions made by the GPT Investment Committee, meaning climate and nature-related impacts (where relevant) are part of our investment decision making. Moreover, our climate and nature-based risk assessments encompasses our direct operations and potential upstream and downstream impacts which can flow on to our business risk.

The cross-functional Sustainability Reference Group discuss emerging climate and nature-related risks and opportunities, such as those outlined in the TNFD.

For further details on specific climate-related risks and our response, see Appendix A. For details regarding other nature-related risk, see Appendix B. The time horizons on which these risks are considered are outlined in Section 3.1.1 Time horizons for climate and nature-related risks and opportunities.

4.2 Climate risk review processes

As a result of climate change, GPT's assets have the potential to be exposed to acute climate events such as severe weather and bush fire, and chronic, prolonged climate-driven shifts such as water scarcity, higher average temperatures and rising sea levels.

GPT's response to identify, assess and manage transition and physical climate-related risks and opportunities is both at a portfolio and asset level. GPT undertakes asset level climate risk reviews and adaptation planning using climate scenario modelling sourced from XDI (see details on our physical climate modelling on page 19).

Based on GPT's existing Risk Management Framework, a Climate Hazards and Consequences Matrix has been developed to assess climate risks at an asset level. The Matrix considers operational expenditure, capital expenditure and other consequences that could impact the viability of the asset. GPT categorises the potential consequences as either:

1. **Direct**: The impact of the hazards directly on GPT's physical assets or business operations, or
2. **Indirect**: The impact of the hazards on the surrounding community, infrastructure and local economy in which GPT's assets are located and on which our success is linked. This is in line with a just transition to prevent stranded assets, workers or communities.

In GPT's climate and adaptation workshops, the Matrix helps assess the significance of risks and opportunities to the asset, guiding the determination of their risk level and appropriate treatment. The workshops are attended by our Climate Risk Manager, members from the Sustainability Team and relevant portfolio business units such as development and management teams, external consultants, project managers, engineers and other critical stakeholders.

At an asset level, climate-related risks and opportunities are considered quantitatively using operational expenditure, capital expenditure and other consequence thresholds relative to each asset's net operating income or fair value. Risk levels, impacts and treatments are recorded in an asset Climate Risk Register that is reviewed on a regular basis as part of the risk management process.

GPT continues to refine its climate adaptation planning process, focusing on identifying material risks. As the climate changes, so too will our approach to adapting our assets.

4.2.1 Transition risk and opportunity

GPT has identified transition risks and opportunities that may affect our business activities. These risks are likely to emerge in the low emissions scenario and are anticipated to arise in the short-to-medium term. In this scenario, regulatory changes, market expectations and technology change are anticipated to drive the transition to a low carbon economy to seek to avoid dangerous climate change. Transformations in economic, social, technological and political decisions and actions remain necessary to mitigate transitional risks, adapt to sustainable development and capitalise on opportunities. These risks and opportunities are most relevant at the regional or portfolio level, and when considering our Group strategy, rather than at the individual asset level. However, if they pose a risk or opportunity at an asset level, they will be assessed and treated, where appropriate, alongside physical risks in climate adaptation workshops.

We acknowledge the uncertainty around future projections, particularly regarding the uptake of electric vehicles (EVs) which is an emerging market with regulatory changes likely in the short-to-medium term.

In our risk analysis and planning, GPT considered the low emissions scenario RCP 2.6 which broadly supports the aim of the Paris Agreement commitments. This pathway is associated with SSP1 scenario (sustainability-focused growth and equality) which features low challenges to mitigation and adaptation due to rapid technological development, relative global equality of income and focus on environmental sustainability. This includes increasing shares of renewables and other low carbon energy sources.

Transition risks of climate change that are currently considered by GPT are:

- Policy and regulatory change
- Changes to market expectation, economic disruption and impacts to reputation
- Technology change

For details on the above risks and opportunities to GPT, our current response and strategy, and our near-term approach, see Appendix A and the TCFD tab on our Sustainability Data Dashboard.

4.2.2 Physical climate risk

Without additional global efforts to constrain emissions, a high-emissions scenario such as RCP 8.5 could lead to global warming of between 3.3°C and 5.7°C this century and a wide range of acute and physical risks. Through our carbon neutral efforts, GPT is reducing our contribution to a high emissions scenario. Nonetheless, we recognise the potential impacts of this scenario on our business and assets.

To proactively address these risks, GPT has incorporated a high emissions scenario into our risk assessment and planning process, utilising our knowledge of an asset's local weather and current climate to reduce its vulnerability. However, as asset lifecycles are of relatively long duration, adaptation opportunities must be addressed in resilience plans in the short-to-medium term when upgrade opportunities arise.

We acknowledge that uncertainty exists in future projections of physical risks. The greatest uncertainty to GPT exists around increasing heat and resulting severe weather, and how we respond to the risks. By using RCP 8.5 modelling, the high emissions scenario, we are able to assess and address the most extreme potential risks and opportunities.

RCP 8.5, associated with the SSP5 scenario, is characterised by high fossil fuel use and low climate mitigation efforts in the push for economic and social development, leading to significant climate change impacts. This scenario has heavy reliance on fossil fuels with an increasing contribution of coal to the energy mix.

Physical climate hazards (acute and chronic) include:

- Rising average temperatures
- Increasing number of days per year exceeding critical heat thresholds
- Increasing frequency and duration of heatwaves
- Riverine and flash flooding
- Tidal inundation from rising sea levels
- Drought and water scarcity
- Severe weather, including convective thunderstorms
- Increasing fire weather intensity
- Changes in humidity
- Extreme winds
- Soil movement

4.2.2.1 Asset-level physical hazard identification

Our assessment of climate-related risks for our assets has moved beyond just measuring exposure to also measuring vulnerability and opportunity. GPT conducted a physical hazard exposure exercise for all assets in our portfolio during 2020, considering the potential acute and chronic impacts of climate change under the RCP 8.5 scenario. The analysis informed GPT's risk levels relative to the risk appetite until more detailed climate-related vulnerability assessments were undertaken and opportunity analyses using detailed climate modelling.

In 2022, GPT procured detailed, high resolution climate modelling for all assets across the office, retail and logistics portfolios from XDI. In 2023, the modelling was used in a comprehensive physical climate hazard vulnerability assessment for all GPT's retail, office and logistics assets to assist in prioritising key assets at risk of climate change.

Climate risk reviews and adaptation planning for GPT owned and co-owned assets continued throughout 2024, following standards such as ISO 14090, ISO 14091 and AS 5334-2013. We consider the potential risks and consequences arising from extreme weather events, beyond simply identifying areas at risk.

Equally as important as addressing direct physical climate hazards to our assets, GPT identified how the hazards may have an indirect impact. This involved identifying possible consequences should surrounding communities, infrastructure or economies be affected, by single or compounding climate change induced events. The risks and opportunities from these physical hazards often overlap with transition risks related to climate change.

Detailed climate risk reviews and adaptation planning have been incorporated into major development projects, as an input into governance processes, and investment decisions regarding plant and equipment to optimise building performance and future resilience. The risk reviews and adaptation workshops have also contributed to Green Star accreditation for existing assets and developments currently underway.

GPT is on track to complete climate adaptation plans for at least 90 per cent (by value) of wholly owned and managed assets by end 2026. GPT continues to conduct climate risk reviews and adaptation planning for all GPT assets to identify and reduce vulnerabilities to potential climate change hazards.

For details on the above physical risks to GPT, our current response and strategy, and our approach across multiple time horizons, see Appendix A and the TCFD tab of our Sustainability Data Dashboard.

4.3 Nature risk review processes

In addition to the physical risks posed by climate change, our assets and operations are increasingly exposed to risks related to biodiversity loss, cultural heritage and stormwater management. These risks arise from both chronic environmental changes, such as habitat degradation and biodiversity loss, and acute events like extreme weather, flooding, and stormwater runoff. Similarly, cultural heritage risks can stem from disruptions to land and natural environments that have significant cultural, historical, or social value. These risks can impact asset resilience, operational continuity, and compliance with both environmental and heritage regulations.

GPT's position of identifying, assessing, and managing these nature-related risks is integrated at both the portfolio and asset levels. Through nature risk reviews and management planning, GPT works to assess how biodiversity, stormwater, and cultural heritage risks may affect our assets, surrounding communities, and the broader environment. These reviews incorporate input from stormwater experts, environmental consultants, and heritage specialists, supporting the aim of emerging global frameworks on nature-related risks, such as the TNFD.

As part of GPT's broader Risk Management Framework, nature-related risks are assessed and managed using our Risk Assessment Matrix. This Matrix evaluates potential direct and indirect consequences of these risks on asset performance, surrounding ecosystems, and cultural heritage sites. When assessing nature-related risks, we consider the following:

1. **Direct risks**: Impacts on GPT's assets, such as flood damage, habitat destruction, or operational disruptions due to stormwater failures and damage to or loss of cultural heritage sites
2. **Indirect risks**: Impacts on surrounding communities, infrastructure, and ecosystem services that could influence asset resilience or value, including the loss of cultural heritage value, and
3. **Cumulative risks**: The compounded effects of multiple environmental stressors (e.g., increased flooding, biodiversity loss, erosion, and cultural heritage degradation), which can increase long-term operational costs and exacerbate vulnerabilities for both assets and surrounding environments.

In nature risk reviews, GPT integrates biodiversity, stormwater, and cultural heritage risk considerations into broader asset-level assessments, prioritising actions that address the most significant environmental and cultural threats. These reviews also consider potential opportunities, such as:

- Creating new habitats, implementing conservation projects, or investing in ecosystem services that benefit both the environment and surrounding communities
- Engaging with local communities, including First Nations groups, to identify, protect, and support the management of culturally significant sites, and
- Integrating green infrastructure or nature-based solutions (e.g., wetlands, riparian buffers) to reduce flood risks and improve water quality.

GPT has in place ongoing processes that evolve with changing environmental and regulatory landscapes. Asset-level management plans for biodiversity, stormwater, and cultural heritage are integrated into development, redevelopment, and ongoing asset management and capital planning decisions.

4.3.1 Asset-level biodiversity, cultural heritage and stormwater hazard identification

GPT has conducted asset-level assessments to identify risks related to biodiversity loss, stormwater flooding, erosion, and pollution, and cultural heritage impacts across its portfolio. These reviews assess the long-term exposure of assets to environmental stressors, including the impacts of climate change, urban development, and changes in land use. For biodiversity, key risks include habitat fragmentation, species loss, and disruptions to ecosystem services that support the functioning of assets. These services encompass regulating functions, such as air quality management, heat-island effect mitigation, water flow regulation, water purification, pest control, and moderation of extreme climate events. They also include cultural services, such as supporting mental and physical health, recreation, aesthetic values, and spiritual and religious values.

For cultural heritage, risks may include damage to or loss of sites of historical, social, or cultural value. The stormwater risk assessments also consider factors such as:

- Identifying assets located in floodplains or areas vulnerable to heavy rainfall events
- Assessing the capacity of existing stormwater infrastructure to handle increased rainfall and runoff volumes, and
- Evaluating the health of nearby ecosystems and cultural heritage sites that may be impacted by stormwater management practices.

These assessments are conducted using a combination of on-the-ground surveys, modelling tools, and expert consultations so that biodiversity, cultural heritage and stormwater risks are understood.

4.3.1.1 Biodiversity and cultural heritage risk and opportunity

Biodiversity loss poses risks to GPT's operations and the value of our assets, particularly in ecologically sensitive regions or protected areas. These risks include regulatory changes, shifts in stakeholder expectations, and the increasing vulnerability of natural ecosystems.

In addition to biodiversity, GPT considers cultural heritage risks associated with developments that may impact sites of cultural, historical, or social importance. This includes:

- **Habitat destruction**: Impacts on local wildlife and ecosystems due to construction, land development, and operational activities, which may also affect culturally significant landscapes, and
- **Regulatory change**: Increased regulatory pressure for biodiversity protection and cultural heritage preservation, particularly around threatened species, habitats, and heritage sites.

Through biodiversity and cultural heritage risk assessments, GPT aims to minimise our exposure to potential environmental and cultural liabilities and identify opportunities to enhance resilience within both natural ecosystems and cultural landscapes. Adaptation strategies may include habitat restoration, conservation easements, the incorporation of biodiversity and heritage offsets, and engagement with First Nations communities and heritage experts so that developments respect local cultural values.

GPT aims to integrate biodiversity, stormwater, and cultural heritage risk considerations into our broader resilience planning. By 2026, GPT aims to complete green space biodiversity assessments across our portfolio. Additionally, GPT's Stretch Reconciliation Action Plan 2023-26 includes commitments relating to working with Traditional Custodians and First Nations partners to inform GPT's biodiversity initiatives.

GPT works closely with local stakeholders, including councils, First Nations organisations, community groups, and stormwater, biodiversity and cultural heritage experts, so that our management strategies align with regional biodiversity, heritage, and stormwater management objectives.

Supply chain risks are currently under-assessed at GPT and remain a priority area for 2025, as we advance our understanding of our supply chain interface.

4.3.1.2 Stormwater risk and adaptation

Effective stormwater management is critical for resilience, particularly in urban areas subject to flooding, heavy rainfall, and poor drainage infrastructure. In addition to environmental and regulatory compliance, stormwater management also helps maintain ecological health and protect cultural heritage sites from water damage.

GPT's approach to stormwater risk management involves identifying vulnerabilities related to both chronic and acute stormwater events. Risks include:

- **Increased flooding**: Higher rainfall volumes and extreme weather events can overwhelm existing stormwater infrastructure, leading to localised flooding and property damage
- **Water quality degradation**: Poor stormwater runoff management can result in contamination of local waterways, affecting both ecosystem health and cultural sites connected to water bodies, and
- **Erosion and soil degradation**: Stormwater runoff can exacerbate soil erosion, impacting asset stability and cultural heritage sites with historical or archaeological significance.

Adaptation planning for stormwater risk involves implementing sustainable drainage solutions, such as rainwater harvesting, permeable pavements, and stormwater retention systems. GPT also works with local authorities and environmental agencies so that stormwater infrastructure meets the needs of both current and future climates, as well as the protection of culturally sensitive areas.

5.0 Metrics and Targets

GPT aims to reduce our environmental impact. We aspire to be an overall positive contributor to environmental sustainability by reducing GHG emissions across our operations and shifting towards positive outcomes for nature.

Beyond acting on matters within our direct control, we encourage our stakeholders to respond to climate change, reduce waste, manage water sustainably, and protect and enhance biodiversity. We offer support to our tenants with their own decarbonisation and nature-related goals and continue to drive suppliers to provide products and services with lower associated impacts.

Asset-specific KPIs are incorporated into the performance targets of property general managers, centre managers and operations managers.

5.1 Climate Metrics and Targets

5.1.1 Measuring our building's emissions

GPT monitors its direct climate change impacts and reports on emissions, energy, water, and waste for each property annually. Our Sustainability Data Dashboard includes a portfolio-level summary for key metrics – electricity, water, fuels, materials, recycling and emissions – since 2005.

In 2024 GPT obtained limited assurance over sustainability performance data, including the following climate metrics:

- Total energy consumption in base buildings (GJ) = 507,414 GJ
- Energy intensity (MJ/m2) = 271 MJ/m^2
- Scope 1 GHG emissions in tonnes of carbon dioxide equivalent (tCO2e) = 6,590 tCO_2e
- Scope 2 GHG emissions in tonnes of carbon dioxide equivalent (tCO_2e) = 21,357 tCO_2e (market-based result) or 80,128 tCO_2e (location-based result)
- Total net emissions (Scope 1 & Scope 2 emissions net of offsets) (tCO_2e) = 15,802 tCO_2e, and
- Total net emissions intensity (Scope 1 & Scope 2 emissions net of offsets) ($kgCO_2e/m^2$) = 8 $kgCO_2e/m^2$.

The GHG emission calculations adhere to and are assured against the Greenhouse Gas Protocols with the disclosures for both location-based and market-based methods reported in our Sustainability Data Dashboard.

5.1.2 Measuring our organisation's emissions

GPT's corporate activities and business premises have been certified as carbon neutral since 2011. This certification covers material emissions under the operational control of our corporate operations. GPT aims to reduce emissions through initiatives such as energy efficiency improvements at our offices. Emissions that can't be avoided in these areas are offset to achieve net emissions from our corporate operations.

5.1.3 Targets

In accordance with ISO: 14001 Environmental Management Systems, our climate and nature-related targets focus on areas within our operational control. Our approach first seeks to eliminate GHG emissions and nature impacts within our control. Offsets are used for emissions and nature impacts that currently are not possible or practical to eliminate. We further enhance environmental outcomes by working in our areas of influence, such as supporting our supply chain and tenants for which we set targets based on delivery of supporting activities.

GPT sets annual asset-level operational targets for energy, water and waste, driven by optimisation programs and capital upgrades. Medium to long-term operational targets are also set at a portfolio level to inform energy procurement and offsets. Targets are also set for broader performance benchmarks that include multiple environmental aspects such as Greenstar ratings.

Performance against these targets is monitored through our management reporting systems to assess our progress towards our policy goals.

For more information see our Sustainability Data Dashboard and numerous case studies available in our case study library.

5.2 Nature Metrics and Targets

In the final phase of the LEAP approach, known as the Prepare phase, GPT focuses on developing strategies, measuring performance, and setting limited, but appropriate targets. GPT applies the mitigation hierarchy and makes measurable compensatory investments to target positive outcomes for nature. This approach addresses direct and indirect impacts at both the asset and portfolio levels, within our operational control. Beyond standard industry performance measures based on consumption, GPT's nature metrics and targets focus on biodiversity and stormwater matters due to the inherent impacts of the property industry.

GPT's response includes strategies across key areas, such as biodiversity risk management, tenant utility services, national contract management, certification schemes, and embodied carbon standards. In 2023, we began incorporating First Nations considerations into our nature strategy, so that both cultural and ecological values are prioritised.

In 2023, we also expanded the scope of our disclosed nature metrics and targets. These include performance indicators for goals that not only reduce environmental impacts but also enhance resilience to climate and nature-related risks. Our metrics track progress in areas such as land use, water management, pollution reduction, invasive species, management, offering a holistic view of GPT's efforts to protect ecosystems and support sustainable development. Full details of GPT's metrics and targets are available in our Sustainability Data Dashboard.

Focusing on material impacts in 2025, GPT is refining baseline datasets for these metrics, with a focus on land use, freshwater management, and pollution removal. These efforts are essential for tracking progress toward our nature goals. We are also working to better understand and address the more diffuse impacts across our supply chain that are currently under explored.

Rouse Hill Town Centre, NSW

5.2.1 Measuring our Organisation's Nature Displacement and Restoration

As a part of our ISO 14001 Environmental Management System, GPT integrates natural capital measurement to assess and manage the environmental resources and conditions that sustain our operations. This approach not only helps to minimise environmental impacts but also informs our risk and opportunity assessments. Our natural capital assessments follow several key steps:

1. Inventory and Assessment

GPT begins by identifying and cataloguing natural capital assets essential to both the business and nature — such as land, water, biodiversity, and cultural heritage. This process involves the initial identification and classification of these resources, along with building an understanding the type and scale of positive and negative impacts of the business's activities, such as land clearing, land restoration, water consumption, and stormwater discharge. GPT initiated this phase in 2023 through a TNFD pilot project, enabling the business to assess and catalogue its natural capital assets.

2. Quantification

To track progress, GPT establishes baseline measurements for our natural capital assets, creating benchmarks for future assessments. We monitor changes in the extent and condition of resources such as freshwater, land, biodiversity, and sociocultural assets. Tools such as flora and fauna assessments, green space biodiversity evaluations, cultural heritage assessments, and MUSIC modelling—supported by state and federal government databases—are used to quantify the impact of our activities on biodiversity, stormwater management, and heritage values. This data allows us to assess how land and water use changes affect local ecosystems and heritage, and how management strategies can mitigate these impacts.

3. Monitoring and Reporting

GPT tracks changes in natural capital through ongoing data collection and analysis. Monitoring allows us to measure progress towards our nature goals and compliance with environmental regulations. Key metrics, including water quality, biodiversity, and stormwater impacts, are updated to reflect GPT's environmental footprint. This data helps optimise resource use, enhance environmental performance, and adapt strategies over time. By embedding monitoring into decision-making, GPT can reduce risks, enhance sustainability, and align operations with broader environmental objectives.

4. Stakeholder Engagement

GPT recognises the critical importance of engaging local communities, including First Nations groups, in the measurement of natural capital. This engagement fosters respect, aligns with community values, and incorporates environmental and human rights considerations. Collaborating with local stakeholders also helps identify risks and opportunities related to natural capital assets.

Looking ahead, GPT plans to expand its stakeholder engagement in natural capital measurement, extending beyond heritage matters and a subset of environmental concerns. We also aim to assign both economic and non-economic values to our natural capital assets, enabling a deeper understanding of their economic, ecological, and social significance.

Key Metrics and Targets – Climate resilience and decarbonisation

Table 7: GPT key climate metrics and targets

Key Performance Indicator	Specific goal or target	Metrics and Progress	Notes
Climate resilience – Assess assets for climate risks.	Embed cyclical reviews and updates of climate adaptation plans into GPT's management procedures.	100% of GPT operational assets reviewed for climate vulnerability in 2023. In 2024 this work continued and was updated once detailed climate adaptation plans were produced at an asset level.	The 2026 goal to deliver a risk based program of climate adaptation plans for at least 90% (by value) of GPT's wholly owned and managed assets is based on GPT's current portfolio. Updates to this goal will be provided should the portfolio grow or major updates in climate modelling should occur. Risk assessments utilise climate modelling provide by XDI with a RCP 8.5 scenario. Uncertainties are inherent in all climate models and the uncertainties increase in the longer term.
Climate resilience – Undertake climate adaptation planning for assets.	Develop and deliver a risk based program of climate adaptation plans for at least 90% (by value) of GPT's wholly owned and managed assets by 2026.	Climate adaptation plans completed for 89% (by value) of GPT's wholly owned and managed assets as at the end of the Reporting Period.	
Decarbonisation – Carbon neutral buildings for GPT owned and operationally controlled assets.	Deliver carbon neutral certification for all GPT owned and operationally controlled assets by end 2024 and maintain thereafter.	As part of GPT's Net Zero Plan, the planned certification of all 28 of the GPT owned and operationally controlled assets by the end of the Reporting Period has been achieved.	Peripheral assets, assets that are operationally controlled by tenants and assets held for development are not included in this goal. New asset acquisitions will require assessment and development of Net Zero Plans before adding to this goal. Where co-ownership arrangement exist, Net Zero Plans are dependent on co-owner approvals.
Decarbonisation – Carbon neutral buildings for GPT co-owned and non-GPT managed assets.	Work with asset co-owners to achieve or maintain carbon neutral certification for the operations of all base buildings by 2030.	Australia Square (co-owned and managed by Dexus) is carbon neutral certified. Negotiations progressed throughout the year for the remaining four co-owned and non-GPT managed assets to meet our target.	Dependent on co-owners aligned strategy for carbon neutrality by 2030. Uncertainties exist in the commitments and potential for change in co-owners decarbonisation plans.
Decarbonisation – Upfront embodied carbon GPT developments	All assets that are developed for GPT's investment portfolio to be upfront embodied carbon neutral from 2023 onwards.	As at the end of the Reporting Period, all five GPT developments that have been completed since the policy commitment have achieved carbon neutral certification for upfront embodied carbon neutrality.	There is a higher dependency on offsets for upfront embodied carbon commitments than for operations of base buildings. Over time GPT is dependent of material manufacturers reducing embodied carbon content in order to reduce the requirements for offsets. We are informed by the Green Building Council of Australia's projections for best practice in Green Star rating tools for the embodied carbon emissions reductions forecast and understand that there are inherent uncertainties in the rates of change of technology to allow this as well as the commercial viability of these changes.
Decarbonisation – Base building energy intensity.	Target: 270 MJ/m^2 by end 2024.	2024 outcome: 271 MJ/m^2	Energy intensity targets are set annually, changes to portfolio, occupancy rates and trade levels can impact delivery of targets.
Decarbonisation – Base building emissions intensity (Scope 1 and 2, market-based).	2024 target: 10 $kgCO_2e/m^2$ by end 2024 (with offsets) and 15$kgCO_2e/m^2$ (without offsets) 2030 target: 0 $kgCO_2e/m^2$ (with offsets) and 3 $kgCO_2e/m^2$ (without offsets)	2024 outcomes: With offsets 8 $kgCO_2e/m^2$ Excluding offsets = 15 $kgCO_2e/m^2$ Baseline: 2005: 136 $kgCO_2e/m^2$ (no offsets in 2005)	Full details of the level of dependency on offsets to achieve emissions intensity targets are provided in GPT's Sustainability Data Dashboard. There is uncertainty regarding future costs of offsets, however GPT has contracted foreseeable needs until 2030 with an assumption of the requirements based on the current development pipeline and portfolio scale. Beyond 2030, any new targets will have a dependency on being able to negotiate a similar partnership to the existing Greenfleet partnership. Additional targets are set annually with long term goals working towards net zero. Changes to portfolio, occupancy rates and trade levels can impact delivery of targets. 2030 net zero targets are dependent on the agreement with co-owners for delivery and will be impacted by changes to the portfolio.
Decarbonisation – Base building absolute emissions (Scope 1 and 2, market-based).	2030 target of 0 tCO_2e (with offsets) and 4,900 tCO_2e (without offsets)	2024 outcomes: 21,000 tCO_2e (with offsets) and 34,000 tCO_2e (with offsets) Baseline: 2005: 238,750 tCO_2e (no offsets)	

Projections for the 2030 net zero targets are made on the basis of maintaining the GPT carbon neutral certified buildings and public commitments by the co-owners with 2030 net zero targets and switching to renewable electricity.

For more metrics and targets relating to our pillars of climate resilience and the decarbonisation of GPT's portfolio, see the Sustainability Data Dashboard on our website.

Key Metrics and Targets – Nature impacts and dependencies

Table 8: GPT key nature metrics and targets

Nature Pillar	Dependency / Impact	Target	Metric	Unit(s)	Notes
Pollution / Pollution Removal	Impact	Decrease absolute quantity (tonnes) and concentrations of physical (litter, debris), chemical (oil, grease, heavy metals, phosphorus, nitrogen, surfactants, pesticides, detergents, acids), and biological (bacteria) stormwater pollutants below 2020 levels by 2030.	Stormwater pollutants (physical, chemical, biological)	• Total Suspended Solids (kg/year) • Total Phosphorus (kg/year) • Total Nitrogen (kg/year) • Gross Pollutants (kg/year)	In 2024, GPT modelled stormwater pollutant discharge across all GPT-owned and managed assets in line with relevant local and national guidelines. The modelling did not incorporate the functionality of stormwater management systems, such as rainwater tanks, on-site detention, gully pit baskets, gross pollutant traps, and rain gardens. The absolute tonnage target applies to the GPT portfolio of assets at December 2023. Changes to the portfolio of assets will change the baseline from which the target of a decrease is set.
Freshwater Use Change	Impact	Reduce stormwater peak flows and temperature variability to align with the receiving waterway's natural condition/ state, below 2020 levels by 2030.	Stormwater peak and annual flows	• Peak flow (m^3/sec) • Annual flow (ML/year)	In 2024, GPT modelled stormwater flow discharge across all GPT-owned and managed assets in accordance with local and national guidelines. The modelling did not account for the presence or functionality of stormwater management systems, such as rainwater tanks, on-site detention, gully pit baskets, gross pollutant traps, and rain gardens.
Land-Use Change	Dependency & Impact	Avoid developments or sourcing materials that affect areas of high conservation significance (e.g., World Heritage, national/state ecological communities, IUCN categories I-IV) by 2026.	Displacement of ecological communities, species, and habitats	• Hectares • Count	In 2023, GPT displaced 0.0091 hectares of Endangered Heavier-soils Plains Grassland.* In 2024, GPT displaced 1.7 hectares of Endangered Heavier-soils Plains Grassland, 0.4 hectares of Endangered Lignum Swamp, 0.16ha of Endangered River-Flat Eucalypt Forest, and 0.01ha of Endangered Swamp Oak Floodplain Forest. In 2024, GPT also displaced 0.38a of Vulnerable Growling Grass Frog habitat, 0.1ha of Vulnerable Golden Sun Moth habitat, and 0.13ha of Vulnerable Southern Myotis habitat. The displacement of high conservation significance areas by GPT suppliers is currently unknown.
Land-Use Change	Impact	Invest in biodiversity protection and restoration projects that exceed the footprint of GPT-owned assets by 2030	Cumulative footprint of biodiversity protection and restoration projects	• Hectares	Since 2022, 306 hectares of native trees have been planted through GPT's 'Restoring Country for Climate' partnership, equivalent to 50% of GPT's asset footprint. Additionally, prior projects that GPT has supported Greenfleet through offsetting have established around 500 hectares under restoration.
Land-Use Change	Impact	Increase asset biodiversity values (diversity and abundance of indigenous species and ecological communities) above 2020 levels by 2030.	1) GPT's bespoke 'Green Space Biodiversity Value Score' for operational assets. 2) Biodiversity extent (% coverage) and combined extent and condition metrics (e.g., habitat hectare scores) for developments and reserves under management.	• Green space biodiversity values scores (BVS). • Biodiversity extent (% coverage) • Combined extent and condition metrics (e.g., habitat hectare scores)	Since 2022, GPT has assessed biodiversity values within a 500-meter radius of our assets, using state and federal models for remnant ecological communities, as well as for nationally significant listed ecological communities and species habitats. Our mapping also includes historical flora and fauna observations. Additionally, GPT has secured baseline data on the extent and condition of biodiversity values across three greenfield developments and 20 operational assets (including 4 retail, 1 office, and 15 logistics sites).
Invasive Species Introduction and Removal	Impact	Eradicate priority invasive species (weeds of national and state significance) at all GPT assets by 2030.	Invasive species presence	• # assets with priority invasive species	Since 2022, GPT has identified three development assets affected by invasive plant species (weeds) of national and state significance, covering a total area of 108ha within our current 607.5ha asset footprint (18%). Comprehensive invasive species management has been implemented at two sites, with treatment scheduled for the third site in 2025. Invasive species management plans for all affected assets are being finalised with relevant authorities. In addition, voluntary biodiversity assessments have strengthened invasive species management detection across 20 operational assets since 2022.

2020 baselines are established using available databases and modelling. Where 2020 data is not available or cannot be modelled for an asset, the nearest available year of data will be used for the baseline.

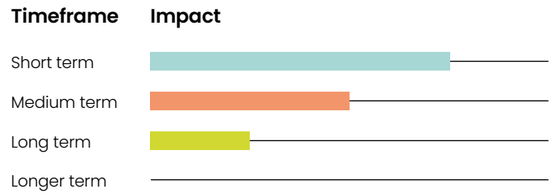
* An increase of 0.0064 hectares of Endangered Heavier-soils Plains Grassland displacement was recorded since GPT's 2023 reporting period, following additional on-ground assessments conducted by third-party ecologists. For more metrics and targets related to our climate resilience pillars and the decarbonisation of GPT's portfolio, please refer to the Sustainability Data Dashboard on our website: https://sustainability.gpt.com.au/data-downloads/.

6.0 Appendix A: Climate-related Risk Analysis and Mitigations

6.1 Transition Risks

Table A1: Policy And Regulatory Change

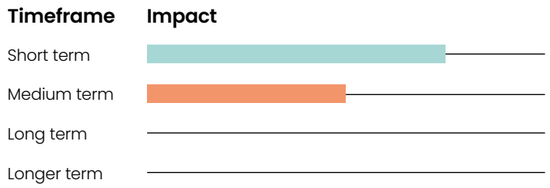
Significant regulatory and policy volatility has already occurred in Australia over the past decade regarding climate change. Assumptions are this trend is expected to continue as the momentum to transition to a low-carbon economy increases around the world.



Risk impacts	GPT's current response and strategy	Near-term approach
Changes to energy tariff structures and potential supply constraints	• Chirnside Park is GPT's first managed shopping centre with investment in solar PV array and battery to achieve energy reliability and supply stability at an affordable rate. • Regularly review the impacts of a transition to renewables and minimise our exposure to regulatory changes which are likely to focus on demand flexibility requirements or energy reliability. • Implement initiatives from our Energy Master Plan, such as on-site solar electricity production, demand-side flexibility and energy storage, to mitigate the impact of potential regulation regarding energy reliability.	As equipment lifecycle opportunities arise, aim to electrify asset heating (from gas) infrastructure to minimise dependency on fossil fuels. In 2020, we secured renewable electricity contracts for our forecast load until 2030 so we can fulfil our carbon neutral goals.
Increased energy prices result in higher operational expenditure and price volatility, causing expenditure uncertainty	• Since 2020, GPT has implemented a progressive procurement approach for energy, which sees GPT hedging electricity rates which has resulted in significant savings. Refer to 'Energy Price Volatility' case study on our website. • The GPT Energy Master Plan provides a roadmap to achieve net zero carbon emissions while reducing energy cost exposure. The plan includes continued efficiency and plant optimisation programs, on-site renewable electricity generation, strengthening energy market knowledge and procurement capabilities, and demand response programs to minimise electricity capacity charges. Efficiency will remain central to our energy strategy.	Explore energy storage options to provide protection to the extent that the majority of Australia's energy supplies are intermittent renewables.
More restrictive land planning codes lead to lower supply of land for construction, resulting in higher capital expenditure	• Climate change impacts are considered by the Due Diligence Committee as part of the investment decision making process. • Use site-specific climate modelling to inform our understanding of potential physical risks that may drive land use and planning requirements.	Explore energy storage options to provide protection when the majority of Australia's energy supplies are intermittent renewables.
Regulatory changes regarding carbon intensive construction materials result in increased capital expenditure for construction and mandatory reporting for embodied carbon	• Collaborate with industry peers and the Green Building Council of Australia to develop a market for lower embodied carbon construction materials. • Explore reduced embodied carbon techniques with our construction partners where feasible for current developments. • Undertake embodied carbon inventory reviews in development planning, which will position us well in the event of future mandatory reporting requirement. • Use lower embodied carbon concrete in logistics developments.	Work with industry groups and peers to understand emerging regulation and policy developments and refine GPT's strategies where needed.
Potential cost impacts from price on carbon	• Continuing to reduce and eliminate carbon emissions from our operations in order to minimise or avoid the impacts of a price on carbon where possible. Our carbon neutral strategy positions us to limit cost impacts and also maximise the opportunities of market shifts to lower carbon properties in their development and operation. • As the majority of carbon emissions in development projects come from concrete and steel, we model the most material emissions, implement processes to minimise emissions and apply a sensitivity analysis to the impacts of a price on carbon or engaging in carbon neutral construction contracts.	Work with industry groups and peers to understand emerging regulation and policy developments and refine GPT's strategies where needed.
Changes to building codes mandating future proofing for transition to a low carbon economy	• GPT is involved in industry working groups and panels to provide input and received insight into potential building code changes. • Climate adaptation planning processes consider foreseeable code changes for new building designs and lifecycle upgrades.	Work with industry groups and peers to understand and act upon emerging legislation and regulations regarding updated building codes.
Increasing sustainability-related disclosures	• GPT has engaged external consultants to review proposed disclosures and make recommendations for the ongoing support of ISSB, TNFD and SFDR reporting frameworks. • GPT has prepared for the adoption of ISSB S1 and S2 standards and TNFD, and preparing for ASRS standards, in readiness for mandatory sustainability-related disclosures.	Continue working to support GPT in fulfilling the requirements of governments, investors, incoming mandatory standards and recommendations of non-mandatory standards.

Table A2: Changes to Market Expectations, Economic Disruption and Impacts to Reputation

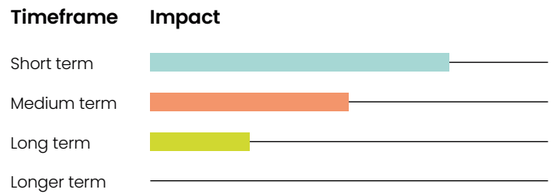
Investor expectations and capital allocation decisions consider organisations that are taking meaningful action to address climate change and their resilience to its effects. In addition, regulators are requiring disclosure around climate risk identification and management.



Risk impacts	GPT's current response and strategy	Near-term approach
Expectations from investors and tenants for buildings and portfolios to reduce their carbon impact	• Engage with investors, tenants and other stakeholders to understand and respond to expectations. • Attain and maintain independent carbon neutral certification for operating assets. • Delivered carbon neutral certification for GPT owned and operationally controlled assets by 2024. • Develop renewable electricity options for tenants by collaborating with energy partners.	GPT's jointly owned and externally managed assets are currently targeting independent carbon neutral certification by 2030. Offer strategies and solutions to our tenants to assist them in lowering their carbon footprint. Increased tenant engagement through asset manager relationship and existing engagement platforms.
Opportunity to attract capital through our sustainability credentials, performance and achievements	• Maintain our reputation for setting and delivering sustainability goals and good corporate governance. • GWOF and GPT combined issued over $1.2 billion of sustainable debt by end 2024.	Continue to develop capital opportunities.
Supply constraints, increased costs and quality concerns over offsets	• GPT has actively partnered with Greenfleet to establish a certainty of supply, quality and price for its foreseeable offset needs until mid-2027. • GPT's offset strategy considers the vintage of the offsets we hold in our registry. We have an active watching brief for any potential changes to certification rules with regard to the use of offsets.	Explore additional opportunities for investment in long term offset creation projects.
Liability risk and greenwashing	• GPT's Board and Executive Team are focused on the authentic delivery of our climate response, backed by the governance processes outlined in this Statement. • Data is independently assured. • Carbon neutral outcomes are independently certified.	Continued enhancement of reporting, with consideration for international best practices.
Disruption to carbon-intensive industries or exposure to increasing physical risks impacting the ability for some tenant classes to remain viable	• GPT engaged an external consultant to assist in identifying sector climate risk exposure and potential consequences for our major tenants, facilitate a workshop with GPT portfolio heads to refine risk levels, and develop a tool to assess climate-related risks to our tenants and therefore revenue risk to GPT based on GPT's existing Risk Management Framework. • Initial review of our major tenants indicates the level of risk associated with reduced rental revenue to GPT due to transitional or physical climate-related risks to their business is minor.	Review industries seen at risk and GPT tenants by tier based on revenue to advise leasing team of revenue at risk.

Table A3: Technology Change

Response to climate change risk is driving change in technology, from carbon intensive to low carbon technologies. For many years, GPT has been an adopter of technologies that improve energy and resource efficiency and we continue to see future opportunities in this space. The transition to new technologies which improve energy efficiency can mean increased regulatory compliance and other new risks, particularly around health and safety. These are considered closely.



Risk impacts	GPT's current response and strategy	Near-term approach
Energy security is impacted during the transition from old to new technologies	• GPT is implementing Smart Energy Hubs in partnership with Shell Energy Australia. One is operational at Chirnside Park Shopping Centre, and in 2024 there were two installations underway with further feasibility studies in progress across the portfolio. Refer to 'Smart Energy Hub' case study on our website. • The transition from coal generation to renewables faces the twin reliability impacts of ageing coal power stations and the non-dispatchable nature of most renewables. GPT is investing in increased demand-side flexibility, on-site generation and storage projects as a defensive strategy against the cost volatility that this transition can drive as well as contributing to grid stability. • Consideration of business continuity during potential long duration or rolling utility outages.	GPT aims to continue to evaluate our on-site storage and develop Smart Energy Hubs in partnership with Shell Energy Australia with goals to better balance energy demand, on-site generation and storage and energy market requirements.
Increasing use of EVs and associated charging negatively impacting an assets fire risk, infrastructure capacity and energy demand profiles	• E-mobility, including electric vehicles, bikes and scooters, is part of the transition to a low carbon economy, however this introduces new risks that most assets were not originally designed to manage. Of particular risk are battery fires that can impact safety and the charging infrastructure that can impact an asset's electrical capacity and peak demand profiles. During charging, where fire risk is more likely, GPT is taking a cautious approach to rolling out support infrastructure. Charging can also impact our asset electrification plans and demand-side flexibility program success. • The adoption of EV charging stations may require additional electrical usage impacting Scope 2 emissions. • Asset specific risk assessments are required on all existing and future installation of any e-mobility charging infrastructure, as well as during asset design and lifecycle upgrades, with risk mitigation works to be determined by the outcome of the risk assessment.	GPT is preparing for the expansion of EVs so that should market expectations require availability of charging infrastructure, our assets can deliver this safely and readily with the most up-to-date and low risk technologies. Lithium fire risk assessments are undertaken and incorporated into asset's Emergency Management Plan.
High cost for infrastructure upgrades to meet tenant expectations for net zero buildings	• Continuous investment over the past two decades has already positioned GPT's buildings with leading sustainability performance with most being carbon neutral certified by 2024. • GPT has a strategy to electrify (degasify) our assets at lifecycle upgrade points as part of our Net Zero Plan.	Tenant engagement strategy to improve the understanding of GPT's net zero building transition and benefits to tenants.

6.2 Physical Risks

Table A4: Physical Hazards Impact Definitions

Physical hazard impacts	Direct impacts	Indirect impacts
Definition	The impact of the hazards directly on GPT's physical assets or business operations.	The impact of the hazards on the surrounding community, infrastructure and local economy in which GPT's assets are located and upon which our success depends.
Attributes considered	• Approximate cost of damage to both operational and capital expenditure • Duration or length of impact • Approximate size of the common areas impacted • Potential immediate health and safety impact • Length of disruption to operations and tenants, and • Implication to new builds.	• Duration or length of impact • Immediate financial impact to the greater regional economy • Potential disruption or decrease of population, and • Long term community impact.

Table A5: Extreme Hot Days, Heatwaves & Rising Average Temperatures

Adaptation:

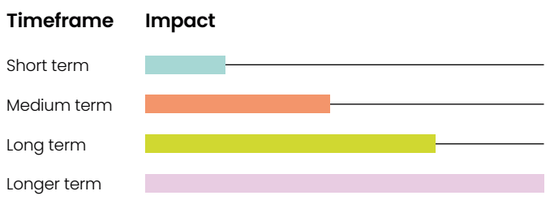
GPT retail and office assets have significant air-conditioning infrastructure with lifecycle upgrades occurring approximately every 15 years.

GPT uses climate modelling to consider this physical climate hazard, such as the projected increase in the number of extreme hot days per year exceeding 35°C in 2030, 2050, 2070 and 2090 at an individual asset level to help inform lifecycle upgrades.

While the economic viability of the communities where we operate is not expected to be undermined by heatwaves, GPT assets can provide refuge for the community during periods of extreme heat.

As a result, we focus on maintaining comfortable conditions, avoiding increases in electricity and equipment costs, and considering critical equipment requirements to reliably provide heat refuges. These considerations are not expected to materially impact asset returns due to existing controls within the Energy Master Plan and lifecycle planning.

Logistics assets have varying mechanical and passive cooling qualities and are often located in the more intense heat impacted areas of cities such as Western Sydney. However, logistics buildings have short lifecycles and GPT is increasing focus on developing and upgrading logistics assets with improved insulation, access to air-conditioning to meet heatwave operating conditions, landscaping designed to minimise heat island impacts and access to on-site solar PV to lower energy costs.



Risk impacts	GPT's current response and strategy	Near-term approach	Long-term approach
Increased capital expenditure and operational expenditure for cooling upgrades or the potential of stranded assets that don't meet comfort condition expectations	Increased business intensity and occupancy density in GPT buildings necessitates increased cooling capacity in our buildings. Our infrastructure upgrade program continues as a part of our capital works program, which includes planning so that cooling infrastructure meets potential future extreme heat conditions. The high-quality cooling infrastructure in GPT's buildings generates comfortable conditions during heatwaves that allows for business-as-usual and may also be a contributor to community resilience. In our retail assets, this may act as a drawcard for visitors seeking respite from the heat. Efficiency programs and air-conditioning optimisation investments are reducing the energy costs to operate our buildings, combined with proactive energy cost management and demand management programs.	Increase emphasis on passive design elements and demand management capabilities so that peak air-conditioning loads avoid overlapping directly with network peaks during heatwaves to minimise operational costs. On-site solar installations at logistics assets to manage energy costs.	Continue to review climate modelling, technology advances, the detailed asset-level climate risk assessments and adaption plans for further actions. Continue to deliver comfortable indoor conditions for those seeking respite from the higher than average temperatures, and engage with local governments to manage refuge risks and opportunities.
Potential damage to infrastructure resulting in utilities service interruptions and access issues for assets	Business continuity plan in place for major acute events and natural disasters, including the management of service interruptions and constrained access to assets.	GPT will specify higher operating temperature ranges for major equipment or where possible, relocate equipment to sheltered positions.	Monitor and understand the resilience of energy infrastructure and update our strategies accordingly.

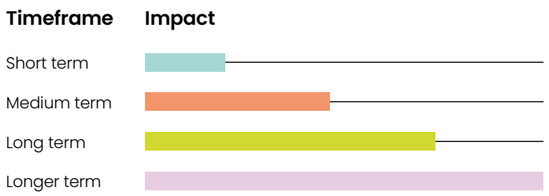
Table A6: Extreme Weather Events Including Floods, Severe Storms and Cyclones

Adaptation:

The majority of GPT assets are not exposed to flood risk. For assets with exposure to potential flooding, we invest in infrastructure to build resilience and maintain operations viability.

Severe storms are a regular occurrence in Australia, mostly from September to April. Every asset will be exposed to severe storms at some point in time, so it is vital we reduce the assets' vulnerability with detailed climate modelling and adaptation planning.

In the short-term, less than 0.2% of GPT's balance sheet is exposed to potential cyclones (one logistics asset in Townsville).

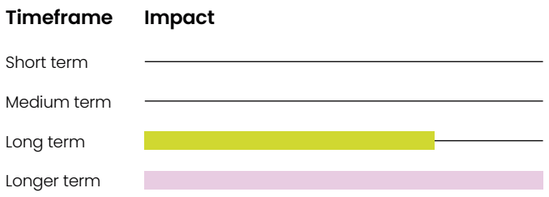


Risk impacts	GPT's current response and strategy	Near-term approach	Long-term approach
Damage to buildings resulting in increased capital expenditure for repairs	Work with our insurers to model potential catastrophic events and so that we understand these risks and have appropriate insurances. Where major capital investments are made, GPT seeks to future-proof our buildings for potential extreme events.	Where major capital investments are made, GPT seeks to future-proof our buildings for potential extreme events.	Detailed climate modelling is included in major developments so that building designs are resilient to extreme weather events.
Disruptions to operations resulting from extreme weather events	GPT has detailed business continuity, maintenance and asset replacement plans that are updated on a regular basis. The major capital cities where most of our assets are located also have strong resilience plans and infrastructure that can withstand extreme weather events. Use available tools to model extreme precipitation when determining lifecycle upgrades to roofs, including guttering systems to limit operational impacts.		

Table A7: Tidal Inundation from Rising Sea Levels

Adaptation:

The vast majority of GPT's assets will not be directly impacted by sea level rise. Minimal impact is also foreseen on the regional economic viability and infrastructure upon which the assets depend. In the very long-term, a small number of assets will be impacted by potential inundation if no preventative actions are taken. However, it is anticipated that these impacts will occur beyond the current building lifespans and adaptation plans will be acted upon as climate outcomes become clearer.



Risk impacts	GPT's current response and strategy	Near-term approach	Long-term approach
Damage from direct flooding of assets or flooding of local infrastructure or communities making the assets inaccessible or isolated from customers	GPT has reviewed all assets for the threat of tidal inundation. The portfolio is assessed as having minimal potential risk in the short- to medium-term.	Work with local government authorities where possible to understand the planning response to potential inundation risks.	Reassess any investments in assets where there are risks of material tidal inundation impacts with the potential to undermine long term investment returns.

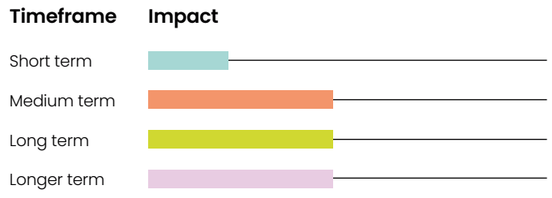
Table A8: Bushfire

The frequency of extreme fire weather days has increased across Australia, and the fire season has become longer since 1950. It is projected that the intensity, frequency and duration of fire weather events will increase further throughout Australia as climate change becomes more extreme, according to the IPCC.

Adaptation:

The vast majority of GPT's assets are not located in bushfire affected areas as they are largely located in capital cities and industrial precincts, resulting in limited direct threat of physical damage to our assets. A small number of logistics assets are situated near bush fire risk areas and have bushfire management plans in place.

We recognise that assets outside of direct fire threats may be impacted by bushfire smoke. Consequently, our planning and future upgrades consider indirect bushfire effects such as the impact on surrounding infrastructure and air quality, and the quality of our assets ventilation and filtration systems in particular.



Risk impacts	GPT's current response and strategy	Near-term approach	Long-term approach
Direct threats from bushfires such as impacts on air quality as well as threats to surrounding infrastructure such as power and roads	Installation of improved air filtration in office assets in response to the COVID-19 pandemic has the joint benefit of improving indoor air quality during events, including bushfires and dust storms.	As a major property manager, GPT will work with local authorities in developing community resilience plans and there is potential for GPT buildings to be a refuge for the community during bushfires.	Review technology advances to provide greater bushfire resilience and engage with local government to manage refuge risks and opportunities.

Table A9: Drought and Water Scarcity

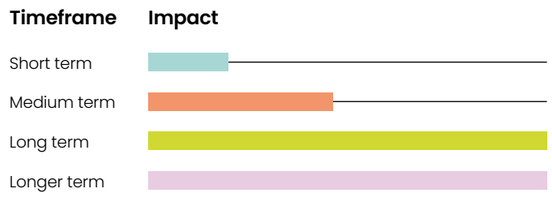
As per the IPCC, time in drought is projected to be more prolonged for eastern, southern and southwestern Australia in the high emissions scenario, while in northern Australia the projected increase is significant only for the extreme drought category. As populations grow in the long term, greater competition for water resources will amplify water scarcity issues and it is foreseeable that many of our urban areas will become more dependent on manufactured water (e.g. desalination plants) which is more costly.

Adaptation:

GPT explores ways to build resilience against water scarcity and reduce water usage and pollution, where possible. GPT has set a target to deliver water neutral operations for GPT owned and managed buildings by 2030. This target is supported by our Water Master Plan, which has a focus on eliminating, reducing and/or substituting potable water consumption through active participation by key parts of the business across the development, operations and lifecycle upgrade phases of our assets.

GPT's major asset-level water use is for cooling towers. Water currently makes up less than four per cent of total asset operational costs, therefore the impact of a potentially significant cost increase imposed by suppliers in response to future water scarcity would be minimal.

As community and regulatory expectations grow, ongoing water infrastructure investments will be required. Several GPT assets already have access to rainwater capture or recycled water which further reduces the potential direct impact from drought hazards.



Risk impacts	GPT's current response and strategy	Near-term approach	Long-term approach
Availability of water for business as usual operations	While GPT is mindful of the increased risk of drought, we do not have investments in regions of Australia that are significantly impacted by drought.	Research diversification of cooling water supply, as an alternative to using potable water. Develop a Water Master Plan to govern water use across the portfolio.	Eliminate the use of water where viable at major asset developments and redevelopments through strategies such as geothermal heat exchange.
Increased price of water	GPT has implemented a water efficiency strategy that has resulted in over a 50 per cent reduction in water intensity of our assets since 2005.	Work with tenants to reduce water usage.	
Increased regulatory requirements regarding the allowable uses of water	Continue to investigate strategies for reducing our water usage, the usage of drinking water for operations, and reducing the degradation of downstream waterways by managing stormwater discharge.	Collaborate with local council and government to build resilient cities and water supply. Engage with the industry to develop a credible scheme for water offsets.	

7.0 Appendix B: Nature-related Risk Analysis and Mitigations

Table B1: Biodiversity-related Risk Analysis and Mitigations

Risk category	Risk description	Risk impact specific	Current response/strategy	Near term approach	Long-term approach
Regulatory compliance risks	Stricter biodiversity and vegetation regulations increase requirements for assessments and habitat preservation.	Delays in development approvals Compliance costs	Engage with experienced environmental consultants early to ensure compliance and maintain management flexibility. Utilise in-house expertise to support ecological assessments and planning with a focus towards streamlining approvals. Develop comprehensive biodiversity management plans (e.g., weed control, revegetation, conservation, and vegetation management plans) in alignment with planning scheme requirements, incorporating strategies for long-term ecological monitoring.	Maintain early engagement with regulators and consultants to streamline the approval process. Provide in-house training and capacity-building to support implementation of biodiversity management procedures for development and operational teams. Allocate resources to ensure effective legal and compliance responses to any violations. Implement comprehensive biodiversity management plans (e.g., weed control, revegetation, conservation, and vegetation management plans) in line with planning scheme requirements, including strategies for long-term ecological monitoring. Anticipate higher compliance costs in project budgets.	Collaborate with industry groups and regulators to shape future vegetation and biodiversity policies, including contributing to legislative development. Allocate resources to ensure effective legal responses to any violations. Continue to implement comprehensive biodiversity management plans (e.g., weed control, revegetation, conservation, and vegetation management plans) in line with planning scheme requirements. Invest in technologies to streamline monitoring and compliance (e.g., drones, AI).
		Legal liabilities	Legal teams monitor evolving regulations and advise on compliance.	Strengthen legal monitoring for regulatory updates.	Build a comprehensive compliance framework specific to biodiversity and vegetation regulations to proactively address legal risks.
Increased development costs	Tighter regulations result in higher greenfield development costs due to required mitigation measures and habitat preservation.	Higher land acquisition costs	Perform comprehensive due diligence for ecological communities and species and their habitats prior to land acquisition.	Negotiate conservation easements or biodiversity offsets (general habitat units) to lower costs.	Develop advanced biodiversity offset programs to mitigate land acquisition costs associated with biodiversity impacts.
		Infrastructure modifications	Implementing green infrastructure (e.g., native vegetation bioswales and raingardens) to preserve biodiversity.	Optimise green infrastructure to balance cost and sustainability goals.	Prioritise industry-leading sustainable 'green designs' that integrate and champion biodiversity values.
		Ongoing management costs	Develop robust biodiversity management plans (e.g., weed and revegetation plans, conservation management plans, and vegetation management plans) in accordance with planning scheme requirements, that include strategies for weed control, revegetation, and long-term ecological monitoring.	Implement long-term biodiversity management and monitoring plans.	Design green spaces and conservation reserves that reflect local values and require minimal long-term management, supported by responsive adaptive management systems.
Reputational risks	Failure to comply with biodiversity regulations or damaging practices harms reputation.	Community backlash	Communicate environmental initiatives to stakeholders, ensuring transparency.	Develop proactive PR strategies and highlight biodiversity initiatives.	Build trust with stakeholders through collaborative sustainability efforts.
		Investor confidence	Align projects with global ESG frameworks and engage with ESG investors.	Increase transparency in sustainability reporting to retain ESG investors.	Increase transparency of measurable positive impacts on biodiversity.
		Loss of public support	Engage local communities early in the planning process.	Strengthen stakeholder engagement by involving environmental groups.	Cultivate long-term relationships through biodiversity conservation projects.

Risk category	Risk description	Risk impact specific	Current response/strategy	Near term approach	Long-term approach
Impact on property valuation and market demand	Stricter biodiversity regulations negatively impact property value and demand.	Reduced demand for developed properties	Incorporate green building certifications (e.g., Green Star, NABERS) into developments.	Develop properties in eco-friendly locations and highlight these features.	Position biodiversity as a key selling point, attracting premium tenants.
		Lower asset liquidity	Focus on incorporating sustainability features into developments.	Market properties as eco-friendly to improve attractiveness and reduce vacancy rates.	Build a portfolio of sustainable properties to ensure long-term liquidity.
		Increased vacancy rates	Achieve environmental certifications for all developments.	Design sustainable spaces with embedded biodiversity features.	Build future-proof, environmentally responsible properties.
Environmental liability risks	Increased scrutiny on biodiversity leads to legal and financial liabilities.	Fines and penalties	Conduct proactive environmental risk assessments.	Update risk mitigation plans to ensure compliance and avoid penalties.	Develop long-term liability management systems to track and mitigate environmental impacts.
		Mitigation and compensation costs	Work with specialists to identify mandated biodiversity offsets and compensation strategies. Leverage in-house expertise in ecological assessments and planning.	Develop cost-effective mitigation plans through partnerships. Support the creation of an industry-aligned offsetting standard (biodiversity, water quality, carbon offsets).	Implement offsetting standard to mitigate current and future biodiversity offset liabilities.
		Long-term liability	Engage in long-term agreements for habitat restoration and preservation.	Allocate funds to support long-term environmental commitments. Develop an offsetting standard that outlines the procurement of biodiversity offsets as a voluntary mechanism to mitigate residual biodiversity impacts.	Plan for financial sustainability by integrating biodiversity obligations into business planning.
Operational and supply chain disruptions	Stricter biodiversity regulations disrupts development processes.	Project delays	Partner with environmental and GIS consultants to ensure timely compliance. Leverage in-house expertise in ecological assessments and planning.	Streamline environmental reviews to expedite the process.	Use AI for faster environmental assessments.
		Supply chain disruptions	Engage with suppliers familiar with biodiversity regulations.	Strengthen supplier relationships to meet environmental requirements.	Establish long-term partnerships with sustainable suppliers.
Potential for zoning changes or land use restrictions	Stricter biodiversity regulations leads to changes in zoning or land use laws.	Reduced development potential	Conduct thorough land-use assessments before acquiring land. Leverage in-house expertise in ecological assessments and planning.	Collaborate with local authorities early to negotiate favourable zoning terms.	Adapt quickly to zoning changes, ensuring flexibility in development plans.
		Land value decreases	Assess conservation areas and minimise impact on land value.	Reevaluate land value metrics based on zoning changes.	Diversify land portfolio to focus on areas less impacted by biodiversity regulations.
Stakeholder engagement and risk of litigation	Increased need for consultations with stakeholders, including environmental groups.	Opposition from environmental groups	Engage stakeholders early to address concerns.	Increase transparency and engage environmental groups to prevent litigation.	Build long-term partnerships with NGOs to reduce litigation risks.
		Public consultation requirements	Use public consultation frameworks for transparent communication.	Strengthen community relations through continuous engagement.	Institutionalise stakeholder engagement processes across all projects.

Table B2: Stormwater-related Risk Analysis and Mitigations

Risk category	Risk description	Risk impact specific	Current response/strategy	Near term approach	Long-term approach
Increased development costs	Stricter stormwater regulations increases upfront development costs.	Higher initial capital expenditure	Implementing moderately complex stormwater systems; ongoing exploration of more advanced solutions.	Conduct a cost-benefit analysis of advanced stormwater technologies, including multi-asset, sub-catchment scale solutions.	Invest in cost-effective stormwater technologies, continue to build in-house expertise, and promote multi-asset, sub-catchment scale stormwater solutions.
		Design complexity	Existing assets typically utilise basic stormwater solutions, while more advanced systems are being explored for greenfield sites.	Collaborate with experienced high-quality stormwater consultants for timely, cost-effective and compliant designs.	Build strong partnerships with regulators and top-tier consultants to ensure the timely, cost-effective, and compliant delivery of designs.
		Increased regulatory compliance costs	Budget for assessments and permits but sometimes do not fully account for increasing complexity. Engage with experienced stormwater consultants early to ensure compliance and maintain management flexibility. Utilise in-house expertise to support stormwater assessments and planning with a focus towards streamlining approvals.	Engage early with regulators and consultants to streamline the approval process. Provide in-house training and capacity-building to support the implementation of stormwater management procedures for development teams. Allocate resources to ensure effective legal responses to any violations. Develop and implement comprehensive stormwater management plans in accordance with planning scheme requirements, including strategies for long-term stormwater monitoring. Account for increased compliance costs in project budgets.	Foster and maintain strong relationships with regulators and top-tier consultants to streamline future approvals. Invest in advanced technologies to enhance monitoring and compliance (e.g., automated water quality monitoring, AI, drones). Collaborate with industry groups and regulators to influence stormwater policies, including contributing to legislative development. Allocate resources to ensure prompt and effective legal responses to any violations. Continue implementing comprehensive stormwater management plans in alignment with planning scheme requirements.
Project delays and development timelines	Stricter regulations delay developments due to approval and system complexity.	Longer approval processes	Familiar with approval processes but anticipating future delays.	Proactively engage with regulators to stay informed about emerging requirements. Collaborate with experienced high quality stormwater consultants to ensure timely, high-quality assessments and effective planning.	Build and maintain relationships with regulators and high-quality consultants to streamline future approvals.
		Design and permitting delays	Not fully accounting for time-consuming future stormwater requirements.	Factor in additional time for design revisions and permit applications.	Develop best practices for fast-tracking stormwater system approvals.

Risk category	Risk description	Risk impact specific	Current response/strategy	Near term approach	Long-term approach
Increased operational costs	Increased ongoing operational costs related to stormwater systems.	Maintenance of stormwater infrastructure	Basic stormwater maintenance in place, but more advanced systems will require expanded efforts.	Increase foundational knowledge of existing systems / controls via documentation reviews and physical inspections. Develop operational plans for long-term maintenance and compliance. Provide in-house training and capacity-building to support implementation of water management procedures for operational teams.	Invest in smart technologies to improve operational efficiency.
		Monitoring and reporting	Periodic monitoring in place but anticipating more frequent reporting.	Implement more robust data systems for monitoring compliance.	Partner with tech firms for continuous monitoring systems.
		Higher insurance costs	Anticipate premium increases due to stricter regulations.	Reviewing insurance premiums but not yet addressing potential increases.	Initiate discussions with insurers and explore risk-minimising options.
Legal and regulatory risks	Non-compliance leads to fines and penalties.	Fines and penalties	Monitoring regulations but not fully prepared for penalties across all works.	Enhance internal knowledge and expertise on stormwater legislation. Allocate resources to ensure effective legal and compliance responses to any violations. Develop stormwater management plans for all assets which have the potential for high pollution and flow rates impacts.	Build internal knowledge and expertise on stormwater legislation. Foster and maintain strong relationships with regulators and skilled consultants to facilitate lower regulatory risk.
		Litigation risks	Basic legal frameworks in place but anticipating increased challenges.	Strengthen relationships with legal advisors to address potential claims.	Develop a crisis management team specialising in stormwater disputes.
		Remediation costs	Not specifically budgeting for remediation related to stormwater non-compliance.	Conduct risk assessments for potential stormwater-related remediation costs.	Set up a contingency fund for stormwater remediation.
Reputational risks	Non-compliance damages the company's reputation.	Community backlash	Community engagement ongoing but not fully integrating stormwater management into strategy.	Enhance communication about the company's sustainable stormwater practices.	Develop long-term community engagement strategies that focus on stormwater sustainability.
		Investor confidence	Focused on sustainability but has not communicated stormwater efforts effectively.	Increase ESG reporting to highlight stormwater management efforts.	Create a detailed sustainability strategy to build investor trust.
		Loss of market appeal	Sustainability considerations not fully addressing stormwater management.	Showcase stormwater technologies as part of the company's marketing.	Position the company as a leader in stormwater management and sustainability.

Risk category	Risk description	Risk impact specific	Current response/strategy		Near term approach	Long-term approach
Impact on property valuation and liquidity	Non-compliant systems reduces property value and liquidity.	Reduced market demand	Properties meet current stormwater standards but anticipate future regulatory challenges.		Highlight stormwater compliance in marketing materials.	Ensure developments exceed regulatory requirements to remain desirable.
		Decreased property liquidity	Not faced liquidity issues yet but anticipates challenges as regulations become stricter.		Adjust pricing strategies considering additional stormwater costs.	Develop adaptable properties to meet future stormwater regulations.
		Lower asset value	No direct reduction in asset values yet but acknowledges potential future risks.		Conduct risk assessments and adjust strategies accordingly.	Invest in technologies to enhance stormwater management and protect asset value.
Environmental and ecological risks	Poor stormwater management damages ecosystems.	Water pollution Erosion and habitat destruction Environmental Liabilities	Identify existing assets which lack basic pollution and erosion mitigation measures. Measures not in place for all assets. Conduct stormwater modelling and risk assessments, identifying assets and receiving environments with stormwater sensitivities. Implement at least moderate stormwater treatment solutions for new developments.	Implement robust stormwater sampling programs to complement and calibrate stormwater modelling. Develop stormwater management plans for assets with moderate to high stormwater risks. Plans to include stormwater pollution and erosion control mitigation measures (e.g., detention tanks, vegetated swales, rain gardens, etc) Support the creation of an industry-aligned offsetting standard (biodiversity, water quality, carbon offsets).	Implement stormwater management plans for assets with moderate to high stormwater risks. Allocate funds for environmental liability insurance related to stormwater impacts. Implement offsetting standard to mitigate current and future water quality offset liabilities.	
Supply chain and operational disruptions	Stricter stormwater regulations disrupts developments and supply chain.	Delays in development	Monitoring disruptions but not fully integrating stormwater management into procurement.		Strengthen relationships with suppliers for stormwater materials.	Work closely with suppliers to streamline procurement and meet future regulatory changes.
		Supply chain costs	Not experienced significant cost increases but anticipates future implications.		Adjust procurement strategies to lock in stormwater material costs.	Establish long-term supplier contracts to manage stormwater costs.
		Contractor and consultant availability	Relies on a limited number of contractors with stormwater expertise.		Expand the pool of contractors / consultants skilled in stormwater systems.	Invest in stormwater industry groups and training programs to ensure a steady supply of skilled labour.
Changes in zoning or land use restrictions	Stricter stormwater regulations alters land use or zoning laws.	Reduced development potential	Monitoring zoning laws but not fully anticipating the impact of stormwater regulations.		Engage early with local governments to understand zoning changes.	Build partnerships to influence zoning policies that support sustainable stormwater management.
		Reclassification of land	Assesses land use but not fully accounting for stormwater regulations on land classification.		Conduct environmental impact assessments early to identify potential changes.	Secure land use approvals that prioritise both stormwater and environmental preservation.

Table B3: Heritage-related Risk Analysis and Mitigations

Risk Category	Risk Description	Risk Impact Specific	Current Response/Strategy	Near-Term Approach	Long-Term Approach
Increased development costs	Stricter heritage regulations increases development costs due to more thorough assessments and mitigation measures.	Archaeological and heritage surveys: More extensive surveys may be required, increasing upfront costs.	Preliminary heritage assessments are conducted in greenfield areas.	Increase collaboration with heritage consultants for thorough assessments.	Establish an in-house team for heritage assessments to reduce external dependency.
		Heritage protection measures: additional costs for preservation measures if a heritage site is identified.	Early engagement with heritage specialists for specific needs.	Explore flexible design options to accommodate preservation measures.	Develop long-term strategies for flexible designs to prevent costly retrofits.
		Retrofitting for heritage compliance: modifications to existing properties for preservation may lead to unexpected costs.	Limited retrofitting when required by regulatory authorities.	Implement more thorough pre-construction surveys to avoid unexpected retrofitting.	Incorporate heritage preservation elements into project designs to minimise retrofitting.
Project delays and development timelines	Stricter heritage regulations delay development timelines due to longer approval processes and further investigations.	Increased approval time: longer approval times due to heritage assessments or consultations.	Project teams work closely with local authorities to streamline approvals.	Work with consultants and local councils to improve approval efficiency.	Standardise heritage assessment and approval processes to reduce delays.
		Construction delays: discovery of heritage sites could halt work, causing delays.	Short-term delays managed by adjusting construction schedules.	Identify and address heritage concerns early in planning to reduce disruptions.	Develop long-term strategies to address heritage concerns in pre-planning phases.
		Design and layout changes: Design alterations to protect heritage sites may delay timelines.	Flexibility in design employed, but typically reactive.	Begin exploring adaptable designs to reduce delays.	Develop policies to ensure all designs consider heritage concerns from the outset.
Legal and regulatory risks	Failing to comply with heritage regulations leads to fines, litigation, and remediation costs.	Non-compliance penalties: non-adherence to regulations could result in fines or project shutdowns.	Legal teams ensure compliance with heritage regulations.	Monitor changes in heritage regulations to ensure compliance.	Develop a proactive legal strategy, including regular audits and updates to ensure compliance.
		Litigation risks: legal challenges from environmental or community groups if heritage sites are mishandled.	Legal resources address potential challenges.	Increase engagement with Indigenous groups and heritage bodies.	Establish ongoing relationships with heritage stakeholders to mitigate litigation risks.
		Remediation costs: failure to protect heritage sites may result in significant remediation costs.	Remediation is handled on a case-by-case basis, usually post-issue.	Assess heritage risks early to minimise damage.	Create a comprehensive heritage risk management plan to prevent damage and reduce costs.
Reputational risks	Mishandling of heritage issues harms the company's reputation, affecting community relations, investor confidence, and tenant demand.	Community backlash: discovery of heritage sites and mishandling could damage local relationships.	Reactive approach to heritage issues with community engagement.	Proactively engage with communities and Indigenous groups to reduce backlash.	Build long-term partnerships with heritage organisations and Indigenous groups.
		Loss of stakeholder trust: mishandling heritage issues could result in loss of trust from investors and stakeholders.	Monitoring of stakeholder sentiment, but no proactive strategy for heritage-related reputational risks.	Increase transparency with stakeholders regarding heritage assessments and mitigation measures.	Implement a stakeholder engagement plan with regular updates and consultations.
		Impact on tenant demand: mishandling heritage issues could decrease demand from CSR-focused tenants.	Tenant demand has not been significantly impacted so far.	Highlight the company's focus on sustainability and heritage protection.	Position the company as a leader in responsible development to attract tenants.
Supply chain and operational disruptions	Heritage regulations disrupt development processes and supply chains, particularly during greenfield developments.	Increased complexity in site assessments: Stricter heritage regulations complicate site selection and pre-construction processes.	Heritage assessments are conducted but may not always be early enough.	Improve the speed and consistency of heritage assessments during project planning.	Develop a streamlined internal process for heritage assessments to minimise delays.
		Increased costs from specialised contractors: hiring consultants to assess and mitigate risks may increase costs.	Consultants are hired when required, with costs absorbed by the project budget.	Work with consultants early to better estimate costs and timelines.	Build a preferred network of heritage specialists to improve cost predictability.
		Risk of project suspension: Discovery of significant heritage sites may suspend projects temporarily.	Projects are halted in response to heritage discoveries.	Establish procedures for quickly resuming work after heritage issues are resolved.	Develop contingency plans to minimise suspension impacts and ensure swift project resumption.

Impact on property valuation and liquidity	Heritage concerns reduce property values and liquidity due to delays, costs, and reputational damage.	Reduced property valuation: heritage issues may reduce property value due to design changes or delays.	Valuations are adjusted as needed based on heritage issues.	Adjust valuations proactively and ensure transparency with investors.	Develop strategies to highlight the long-term desirability of heritage-preserved sites.
		Decreased liquidity: properties affected by heritage concerns may take longer to sell or lease.	Liquidity has not been significantly impacted yet.	Address heritage concerns early to prevent liquidity issues.	Promote heritage-sensitive properties as long-term value-driven investments.
		Lower market demand: Heritage restrictions may decrease property attractiveness to investors or tenants.	Demand is assessed on a case-by-case basis.	Develop strategies to market heritage-sensitive properties, emphasising preservation value.	Position the company as a leader in integrating heritage, attracting sustainability-focused investors and tenants.
Changes in zoning or land use restrictions	Stricter heritage regulations lead to zoning changes, affecting development potential.	Altered land use: heritage significance may reclassify land for conservation, restricting development.	Zoning reviews consider heritage but are reactive.	Integrate heritage considerations into early-stage land use planning.	Build relationships with councils and heritage authorities to anticipate zoning changes.
		Zoning delays: heritage assessments may delay zoning changes or approvals.	Some delays due to heritage reviews, though efforts are made to stay on schedule.	Streamline zoning processes by engaging with authorities early.	Foster ongoing relationships with regulators to expedite zoning and development approvals.
		Loss of development potential: sites with heritage value may no longer be viable for original plans.	Potential loss of opportunities managed case-by-case.	Assess viability of heritage-preserved sites early to guide decision-making.	Expand the portfolio of heritage-sensitive projects to demonstrate expertise.

8.0 Appendix C: Glossary

GPT uses terms throughout this Statement that can have multiple definitions. To understand how they relate to GPT and their context in reference to our business and operations, especially in relation to carbon neutral, net zero, and climate transition plans please refer to the following definitions Several national and international bodies and commitments are also referenced throughout this Statement and described below.

Reference	Description
Carbon Neutral	Carbon neutral means reducing emissions where possible and compensating for the remainder by investing in carbon offset projects to achieve net zero overall emissions, as defined in the Australian Government Climate Active Carbon Neutral Standards. GPT uses the term 'Carbon Neutral' to describe the achievement milestones for our emissions reduction targets as part of our overall Net Zero Plan. GPT's carbon neutral targets and outcomes have a reporting boundary of emissions under our operational control. This includes direct emissions, indirect emissions from purchased energy, and emissions from upstream and downstream activities like goods and services. GPT's Carbon Neutral achievements were certified by Climate Active in 2024.
Climate Active	Climate Active is a partnership between the Australian Government and Australian businesses to drive voluntary climate action. Climate Active independently validates and certifies organisations, buildings and developments as operating on a carbon neutral basis once they have proven that they are measuring, reducing and offsetting their emissions, with a net result of zero emissions.
Co-benefits	Co-benefits refer to the simultaneous achievement of multiple objectives or interests as a result of an organisation's actions, where a single initiative or strategy generates positive outcomes across various areas.
Consequences Matrix	A Consequences Matrix is a tool used to evaluate and prioritise risks or outcomes by assessing their likelihood and severity. It typically has two axes: one for the probability of an event happening, and the other for the severity of its impact. This matrix helps organisations make informed decisions by visualising potential risks and their consequences. Key uses include: • Identifying and prioritising risks based on their likelihood and severity, and • Supporting decision-making in risk management, project management, and strategic planning. Key elements: • Likelihood: The probability of an event occurring • Severity: The magnitude of the event's consequences, and • Risk Assessment: Evaluating which risks require immediate action. This tool is widely used in areas like environmental assessments, safety analysis, and business strategy.
Connecting with Country Framework	Connecting with Country is a framework to care for Country when designing built environments.
Decarbonisation	Decarbonisation is both a method of climate change mitigation and the process of significantly reducing or eliminating carbon dioxide (CO2) and other greenhouse gas (GHG) emissions from the atmosphere.
Direct Nature Interface	Direct interface refers to the physical and functional interactions between a business's activities or assets and the natural environment. In the context of GPT's operations, direct interface includes the direct impact that GPT's assets (such as buildings, infrastructure, and land holdings) have on surrounding ecosystems, biodiversity, water resources, and other natural capital components. The concept is integral to identifying nature-related risks and opportunities, as it allows GPT to assess and manage its environmental footprint by tracking how its activities directly affect natural systems, and vice versa.
European Emissions Trading Scheme (EU ETS)	The EU Emissions Trading System is a regional carbon market, specifically within the European Union and a few associated countries. The system requires polluters to purchase permits for their greenhouse gas (GHG) emissions, thereby incentivising them to reduce emissions. The EU ETS aims to lower overall EU emissions while generating revenue that can be used to finance the green transition. It currently covers emissions from the electricity and heat generation, industrial manufacturing, and aviation sectors, which collectively account for roughly 40% of the EU's total GHG emissions. In 2024, the system expanded to include emissions from maritime transport. The EU ETS operates in all EU countries, as well as Iceland, Liechtenstein, Norway, and, since 2020, is linked to the Swiss ETS.
Global Reporting Initiative (GRI)	GRI is an independent international organisation that provides organisations with the widely used standards for sustainability reporting the GRI Standards.
Goals	A goal is a desired outcome or aspiration, whether short-term or long-term, that an individual, group, or organisation aims to achieve. Achieving goals requires focused efforts, which may involve developing new pathways, overcoming challenges, and adapting strategies, all while considering certain assumptions or conditions.
Green Buildings Council Australia (GBCA)	The GBCA develops and manages the Green Star rating system for buildings in Australia. (See further information under Green Star in this glossary.) The GBCA also provides educational resources on sustainable building practices and developments within the Australian built environment.

Reference	Description
Greenhouse Gas (GHG) Protocol	The GHG Protocol establishes comprehensive global standardised frameworks to measure and manage GHG emissions from private and public sector operations, value chains and mitigation actions. The GHG Protocol works with governments, industry associations, NGOs, businesses and other organisations.
Green Star	Founded by the Green Building Council of Australia in 2003 for the Australian environment, Green Star is a leading rating system for sustainable buildings and places, recognised both nationally and internationally. It aims to promote healthy, resilient, and positive building outcomes.
International Financial Reporting Standards (IFRS)	The IFRS Foundation is a not-for-profit, public interest organisation established to develop accounting and sustainability disclosure standards. Standards are developed by their two standard-setting boards, the International Accounting Standards Board (IASB) and the International Sustainability Standards Board (ISSB).
Innogen	A subsidiary of GPT Property Management, which is used as a vehicle to operate the Embedded Networks and Energy Generation.
Intergovernmental Panel on Climate Change (IPCC)	The Intergovernmental Panel on Climate Change (IPCC) is a United Nations body established to assess the science related to climate change. The IPCC was created to provide policymakers with regular scientific assessments on climate change, its implications and potential future risks, as well as to put forward adaptation and mitigation options.
International Sustainability Standards Board (ISSB)	The ISSB is a standard-setting board established under the oversight of the IFRS Foundation. It is responsible for developing and issuing IFRS Sustainability Disclosure Standards (IFRS S1 and S2). These standards aim to provide information about an organisation's sustainability-related risks and opportunities that may be relevant to investors and other stakeholders in their decision-making processes.
International Union for Conservation of Nature (IUCN)	The IUCN protected area categories, or IUCN protected area management categories, are six management categories used to classify protected areas in a system developed by the International Union for Conservation of Nature.
Just transition	A Just Transition aims to minimise the negative social and economic impacts of the shift to a low carbon economy while maximising its benefits. This involves a fair and inclusive transition for all affected workers and communities, including those dependent on fossil fuel industries. Key principles of a Just Transition include social equity, worker protection, regional development, and inclusive decision making.
'Last but not later approach'	The "last but not later" approach refers to the principle that carbon offsets should only be used after all feasible and practical efforts to reduce emissions or mitigate environmental impacts have been exhausted. It emphasises that organisations should prioritise reducing their direct impacts through operational improvements, technology adoption, and other mitigation strategies first. Only after these efforts have been fully implemented and it becomes clear that further reductions are not possible or practical should offsets be used as a final measure. This approach underscores transparency and accountability in environmental impact management so that offsets are applied as a last resort, rather than as an easy substitute for direct action.
Linear economy	A linear economy is a system where resources are extracted, used to create products, and then discarded as waste. It follows a one-way path from raw materials to disposal, leading to environmental degradation, resource depletion, and loss of biodiversity.
Long-term	See Figure 4: Commercial Building LIfecycle Trigger Points and Section 3.1.1 Time Horizons for climate and nature-related risks and opportunities.
Low-carbon concrete	Low-carbon concrete refers to concrete that is produced with reduced carbon emissions, achieved by using alternative materials (e.g., fly ash, slag) to replace part of traditional cement, and through more energy-efficient manufacturing methods.
Low-carbon steel	Low-carbon steel refers to steel produced with reduced carbon emissions, often through methods like using electric arc furnaces, incorporating recycled materials, or using hydrogen instead of carbon in the production process.
Medium-term	See Figure 4: Commercial Building LIfecycle Trigger Points and Section 3.1.1 Time Horizons for climate and nature-related risks and opportunities.
Milestones	A milestone is a significant point in a project or process that marks an important stage or achievement. Milestones often indicate a point of progress or completion within a larger goal.
Mitigation hierarchy	The Mitigation Hierarchy provides a structured framework for organisations to address and manage environmental impacts by prioritising a sequence of actions: 1) Avoidance; 2) Minimisation; 3) Restoration; 4) Offsetting. This approach aims to minimise environmental impacts in a systematic manner.
National Australian Built Environment Rating System (NABERS)	NABERS is a building rating system used in Australia to assess the environmental performance of buildings across various sectors. NABERS rates a building's energy, water, waste, or indoor environment performance based on its operational data.

Reference	Description
Natural Capital	The stock of renewable and non-renewable natural resources (e.g., plants, animals, air, water, soils, minerals) that combine to yield a flow of benefits to people.
Natural Capital Accounting	Natural capital accounting involves measuring, quantifying, and valuing the natural assets—resources and ecosystems—that form the foundation of both society and the environment. These natural assets, such as the flora and fauna in forests, grasslands, and oceans, as well as the clean water and air in rivers and the atmosphere, provide a broad range of essential ecosystem services. These services support critical functions like food and raw material provision, climate regulation, water purification, soil formation, nutrient cycling, and cultural benefits such as recreation and education. They are vital to ecological balance and human well-being, yet they are often overlooked in traditional economic assessments. Natural capital accounting bridges this gap by quantifying and valuing these assets and services, helping to highlight their true importance and guide more sustainable natural resource management. The process of natural capital accounting follows five key steps: 1) Identify and assess the condition of natural capital assets relevant to a business or region. Establishing a baseline is essential for tracking changes over time. 2) Measure the quantity of these assets or the ecosystem services they provide, to determine whether natural capital is being maintained, enhanced, or depleted. 3) Assign value to these assets and services, considering both economic and non-economic factors, such as cultural significance or biodiversity value. 4) Implement systems and metrics to monitor and track changes over time. By monitoring these assets and services, we can more effectively understand and manage the resource. 5) Involve local communities, especially Indigenous peoples, in the process. Their deep connection to the land and sustainable practices are critical to ensuring that our efforts are both sound and respectful.
Nature	Nature is both the abiotic (non-living) and biotic (living) environment – climate, land, freshwater, ocean, and biodiversity (of which people are a part).
Nature Positive	A nature-positive future means that we, as a global society, halt and reverse the loss of nature measured from its current status, reducing future negative impacts alongside restoring and renewing nature, to put both living and non-living nature measurably on the path to recovery.
Nature Roadmap	A Nature Roadmap refers to a strategic plan or framework that outlines an organisation's approach to addressing its environmental impacts, dependencies, and responsibilities related to natural resources and ecosystems. It typically includes specific actions, milestones, and timelines aimed at enhancing sustainability, protecting biodiversity, and achieving positive outcomes for nature. The roadmap may cover areas such as resource management, biodiversity protection, climate resilience, and compliance with environmental regulations. It serves as a guide for decision-making, so that the organisation systematically and transparently advances its nature-related goals.
Net Zero Plan	GPT's Net Zero Plan is our comprehensive approach to climate change. It could also be referred to as a Climate Transition Plan or Climate Transition Action Plan. The plan aims to reduce GHG emissions (Scope 1 and 2), transition to a low carbon economy, and foster business resilience in various climate scenarios.
Operational control	Operational control is where an entity has principal decision making authority in respect of operating a space or a service. For example, GPT does not have operational control over the majority of its logistics assets, where tenants have principal decision making authority over matters such as entry into contracts for the supply of energy and its use on site. GPT has operational control of base building energy and emissions in office and retail assets and does not have operational control over energy and emissions in logistics assets.
Paris Agreement	The Paris Agreement is an international treaty on climate change adopted by 196 Parties at COP 21 in Paris, on 12 December 2015, and entered into force on 4 November 2016. Its goal is to limit global warming to well below 2 degrees Celsius, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. The Agreement aims to achieve this through nationally determined contributions (NDCs), which are voluntary commitments from each country to reduce greenhouse gas emissions.
Physical risks	Physical risks are a direct result of an organisation's dependencies on nature. These are risks arising when natural systems are compromised, due to the impact of climatic events (e.g. extreme weather such as a drought), geologic events (e.g. seismic events such as an earthquake) or changes in ecosystem equilibria, such as changes in soil quality or ocean chemistry. These can be acute, chronic or both.
Ramsar wetlands	A Ramsar site is a wetland area designated under the Ramsar Convention, an international treaty for the conservation and sustainable use of wetlands. In Australia, Ramsar sites are protected under both national legislation (the *Environment Protection and Biodiversity Conservation Act 1999* or EPBC Act) and state legislation, ensuring their conservation and sustainable management.
Renewable Electricity	Renewable electricity refers to electricity generated from renewable energy sources that are naturally replenished on a human timescale. These sources include solar, wind, hydroelectric, geothermal, and biomass energy. Unlike fossil fuels, renewable energy sources do not deplete over time and typically have a much lower environmental impact, making them key to reducing greenhouse gas emissions and combating climate change.
Representative Concentration Pathways (RCPs)	RCPs are different GHG concentrations and their radiative forcing potential to describe different climate futures that are considered in scenario analysis, and have been formally adopted by the IPCC.

Reference	Description
Residual emissions	Emissions that remain after control have been put in place to reduce and eliminate inherent emissions from our activities.
Resource circularity	Resource circularity refers to the practice of designing products and processes in a way that materials and resources are reused, refurbished, remanufactured, and recycled at the end of their life cycle, reducing waste and the need for new raw materials. This concept aims to create a closed-loop system where resources are continuously circulated through the economy, minimising environmental impacts.
Safeguard Mechanism	The Australian Government's Safeguard Mechanism is a policy that sets legislated limits on GHG emissions from large industrial facilities. These limits, known as baselines, gradually decline over time, requiring facilities to reduce their emissions contributions. Facilities exceeding their baselines are required to purchase Australian Carbon Credit Units (ACCUs) to offset their excess emissions.
Shared Socioeconomic Pathways (SSPs)	SSPs describe different futures of socio-economic development in the absence of climate policy intervention. The combination of SSP-based socio-economic scenarios and RCP-based climate projections are often used together to consider future climate impact and policy analysis.
Short-term	See Figure 1: Commercial Building LIfecycle Trigger Points and Section 3.1.1 Time Horizons for climate and nature-related risks and opportunities.
Sustainability (including sustainable and sustainably)	GPT's approach to sustainability and our sustainability aims is set out in section 1.2. While our sustainability aims are considered in our business practices, we recognise that there may be impacts from our business on sustainability issues and trade-offs between our sustainability approach and other considerations. As such, references to sustainability (including sustainable and sustainably) do not mean that there will be no adverse impacts on the environment, human rights, or other sustainability issues.
Sustainable Debt Framework	The GPT Group Sustainable Framework was established in October 2021 which outlines how GPT and GPT's Wholesale Funds (The GPT Wholesale Office Fund and The GPT Wholesale Shopping Centre Fund) intend to issue and manage sustainable debt. It has been developed in line with the principles and guidelines issued by the International Capital Market Association (ICMA), Loan Markets Association (LMA), Asia-Pacific Loan Market Association (APLMA) and where relevant, the Climate Bonds Initiative (CBI). These market standards are voluntary.
Sustainable finance	Sustainable finance refers to financial activities, investments, or strategies that take into account environmental, social, and governance (ESG) factors in addition to financial returns. The goal of sustainable finance is to support the transition to a low-carbon, resource-efficient, and inclusive economy by directing capital to projects and businesses that contribute to sustainable development goals (SDGs), such as addressing climate change, promoting social equity, and supporting good governance practices.
Targets	A target is a specific, measurable objective or benchmark that an organisation or individual aims to achieve within a defined timeframe.
Task Force on Climate-Related Financial Disclosures (TCFD)	The TCFD was established by the Financial Stability Board to develop recommendations for climate-related financial disclosures. The TCFD recommendations, released in 2017, aim to help companies provide information to investors, lenders, and insurers on how they identify, assess, and manage climate-related risks and opportunities. These recommendations cover four key areas: governance, strategy, risk management, and metrics and targets.
Taskforce on Nature-related Financial Disclosures (TNFD)	The TNFD is a global, market-led initiative that aims to develop and deliver a risk management and disclosure framework for organisations to report on their nature-related risks and opportunities. The full framework was released for market adoption in September 2023.
Transition risks	Transition risks are risks that result from a misalignment between an organisation's or an investors strategy and management and the changing landscape in which it operates. Developments aimed at halting or reversing the damage to nature, such as government regulations or policy, technological developments, market changes, litigation and changing consumer preferences, can all result in transition risks (TNFD).
Very long-term	See Figure 4: Commercial Building LIfecycle Trigger Points and Section 3.1.1 Time Horizons for climate and nature-related risks and opportunities.
Water neutral	Water neutral is achieved when the environmental impacts on the water cycle are eliminated or reduced and compensated for in nature, with GPT's direct impacts including water withdrawals, discharged storm water flows and discharged pollution from storm water and sewerage.

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