

16 December 2021

## Modern Slavery Statement

The Aventus Group is a listed property group comprising Aventus Holdings Limited (Company) and the Aventus Retail Property Trust (Fund) (together, the **Aventus Group**).

This Statement is provided by the Aventus Group and covers all entities over which the Company and Fund control and report on.

In assessing how we can play a role in combating modern slavery, our team is guided by our Group values of:

*People First*

*Own It*

*Find a Better Way*

These values encourage the recognition of the value of all people in, and impacted by, our business, accountability for our actions and always striving to for continuous improvement to implement positive changes.

This statement has been approved by the Board of the Aventus Group on 16 December 2021.

**Darren Holland**  
CEO

## Introduction

The Aventus Group (AVN) is subject to the Modern Slavery Act 2018 (Cth) ('Act') that commenced operation on 1 January 2019 that requires reporting entities subject to the Act, to produce an annual modern slavery statement.

The Aventus Group Modern Slavery Statement sets out the following information in compliance with its obligations, to:

- identify the reporting entity as the Aventus Group and all related entities it owns or controls;
- describe the Group structure, operations and supply chains;
- describe the risks of modern slavery practices in our operations and supply chains;
- describe the actions taken to assess and address those risks, including due diligence and remediation processes;
- describe how we will assess the effectiveness of such actions;
- describe the process of consultation with any entities that the reporting entity owns or controls;
- include any other information that we consider relevant.

## The Reporting Entity

The Aventus Group is a listed property group comprising Aventus Holdings Limited (Company) and the Aventus Retail Property Trust (Fund) (together, the Aventus Group). Shares in the Company and units in the Fund are traded collectively as stapled securities on the ASX under the code AVN.

This Statement is provided by the Aventus Group and covers all entities over which the Company and Fund have control for accounting purposes. Please see the Aventus Group Structure in Table 1 and the Governance and Structure in Table 2.

It satisfies the consultation obligation as there is a Group governance structure that applies to all subsidiary entities to ensure that all corporate actions are overseen at the Group level.

## Our structure, operations and supply chains

The Aventus Group undertakes the business of owning and managing a Large Format Retail (LFR) portfolio which comprises property management, development management and funds management services, and acts as the responsible entity for the Fund.

It also provides property and development management services for external owners of assets and other third parties via an unlisted property syndicate.

As at 30 June 2021, the Group had 20 LFR centres under management across Australia valued at circa \$2.2 billion.

The majority of the Group's earnings are derived from rental income, with other ancillary income derived from external fees and other sources.

A national office is located in Sydney, NSW with centre management offices located in NSW, Victoria, Queensland, and SA.

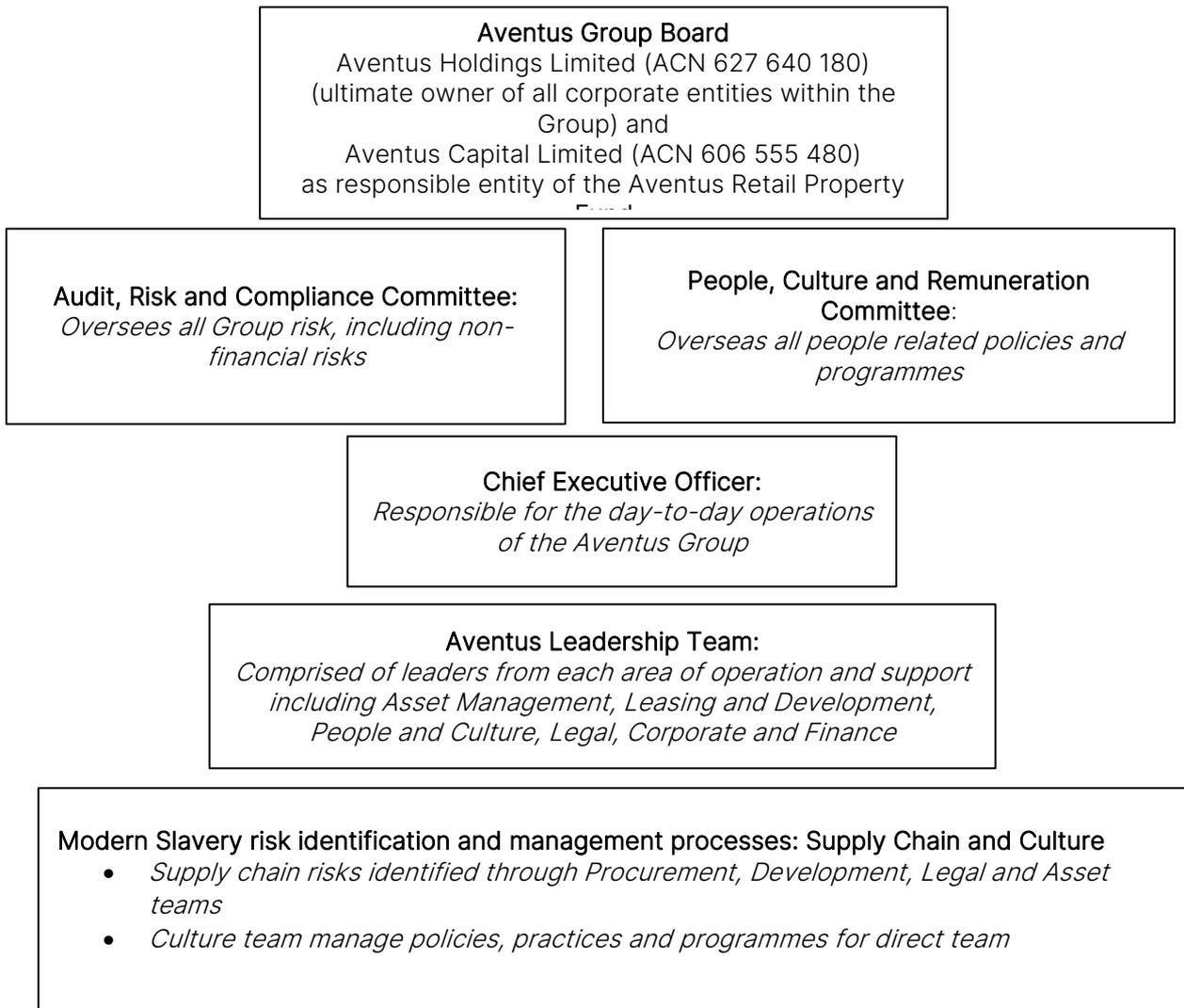
Approximately 75 team members are employed across centres and in our Sydney office.

For more information about our business and structure please refer to our Annual Report available of the Aventus Group website at [aventusgroup.com.au](http://aventusgroup.com.au).

Table 1: Aventus Group Structure, Operations and Supply Chains – Overview

Structure	Operations	Supply Chains
ASX Listed and Stapled Property Group	Ownership and management of the Aventus Retail Property Fund which comprises Large Format Retail Shopping Centres	Australia
AHL owns and controls all corporate subsidiaries and ARPF owns all property sub-trusts	Property Management Fund Management Development services Corporate Offices	See Table 3
Subsidiary companies comprise the property and funds management entities, property owning entities and entities that perform the various corporate actions of the Group	Australia	The majority of our goods and services are supplied by Australian based companies
The LFR centres operate under the Aventus Super Centre, Home of Hub brands in the locations were they are situated	19 Large Format Retail centres located in NSW, Qld, Vic, SA and WA. Approximately 75 team members across the centre and corporate offices located in Australia	
Aventus Holdings Limited: ACN 627 640 180  Aventus Retail Property Fund ARSN 608 000 754	The types of supply arrangements in place comprise long term operational type supplies, office rental and shorter term development and project suppliers	
Level 33 Governor Macquarie Tower One Farrer Place Sydney NSW 2000	The Aventus Group has no joint venture arrangements in place but does manage one externally owned centre and one property syndicate	

Table 2: Ownership & Governance structure



The Aventus Group supply chain can be viewed across the different types operations involved in the management of 19 LFR centres and includes centre management and operations, development activities within LFR centres and the management of corporate team and support services.

**Table 3: Supply Chain**

Key Business Categories	Types of suppliers engaged
Centre Management and Operations	Suppliers of property management services such as cleaning, security, waste management, air conditioning, landscaping and maintenance services, vertical transport and essential services such as energy, sewage and water
Development activity	Builders, contractors, materials suppliers, design consultants, and tradespeople
Centre and corporate offices	Office supplies, corporate projects, employment and training of team, external legal advice, leasing services, IT infrastructure and support services and travel.

## **The risks of modern slavery practises in the operations and supply chains of the Aventus Group**

The Aventus Group will never knowingly participate in modern slavery practices in its directly controlled operations.

The Aventus Group has assessed that the risk of modern slavery practices within its day-to-day operations and direct workforce is low, as the Aventus team are primarily working in property management and ancillary professional service roles exclusively within Australia. Many companies we deal with are also subject to the Modern Slavery Act.

Our structure, operations and direct workforce are also managed through our people policies and practises, the ethical standards and behavioural conduct requirements that we exhibit in all our dealings, both internal and external, and always in accordance with our Codes of Conduct, and other relevant policies which are approved by the Board.

Our FY21 Sustainability Report details our working environment and commitment to provide a safe and healthy working environment. A copy of this report is available on our website.

In relation to the risk of exposure to modern slavery practises in our supply chain, the risk is considered greater than in our direct workforce. In particular, certain services we require in the day-to-day operations have been highlighted as risk areas in this regard and, in particular, cleaning contractors have been an area of increased focus and awareness. It has been shown that this industry is more likely to employ lower paid foreign, unskilled workers who are potentially at a heightened risk of exploitation and we have made this area our first area of focus.

### **The actions taken by the Aventus Group to assess and address these risks including our due diligence and remediation processes**

In FY20, Aventus commenced determining what actions we must take to assess and address the risks of modern slavery practises occurring in our operations and supply chains. To that end, we are adopting the UN Guiding Principles with respect to undertaking human rights due diligence. In FY21, we have commenced applying these to our ongoing management processes. This will assist us to identify, prevent, mitigate and account for how the Aventus Group addresses actual or potential adverse human rights impacts in our operations and supply chains, including modern slavery.

Further, we have adopted the UN Guiding principles with respect to remediation.

Our approach is summarised in Table 4 below:

Table 4: Due Diligence & Remediation

a. Due Diligence

Due Diligence	Operations	Suppliers
Identifying and assess actual and potential human rights impacts by screening all new suppliers for modern slavery risks	All such practices illegal and will not be tolerated in our operations	Existing and new suppliers and reviewed and screened specifically for modern slavery risks
Integrate the findings across the Group and identify appropriate action to address impacts	Share findings of screening process and introduce specific training to team	Enforcing response to any adverse findings through mechanisms contained in our Supplier Code of Conduct or ceasing engagement
Tracking the Group's performance to check whether impacts are being addressed	Assessing increasing team competencies to identify risk of modern slavery practices	Completing internal audit of supplier screening processes
Publicly communicate what Aventus Group is doing	Increasing team awareness of modern slavery risks	Annually publishing Modern Slavery Statement and making public responses where necessary

b. Remediation Steps

Identification	Response
The entity itself has caused or contributed to adverse impact such as modern slavery	'Make good' the adverse impact by restoring the victim to the situation they would be in if the adverse impact had not occurred.
Modern slavery practises are discovered within Group supply chain	Work with the relevant entity that caused the impact to prevent or mitigate the harm and prevent it recurrence
Unacceptable risk that modern slavery practices may be present in our supply chain	Ending the business relationship with any entity if we determine unacceptable risk of modern slavery practices

## How the Aventus Group assesses the effectiveness of actions being taken to assess and address modern slavery risks

In FY21, we broadened the review to develop a greater understanding of potential exposures across all our suppliers, and:

- Continued to assess the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions;
- Reviewed all company policies and identify those that may be impacted by modern slavery considerations;
- Expanded screening program and conduct further due diligence on suppliers.
- Reviewed all key service supplier contracts to ensure they contain terms that are consistent with the Act.

We furthered ensured that the Aventus Group assesses the effectiveness of its actions and established the following processes in FY21 to commence to assess the effectiveness of our actions:

- Established a process to regularly review the actions we take by establishing an annual leadership management review of our response to modern slavery;
- Regularly checked our risk assessment processes to ensure they remain up-to-date and that there are triggers to identify when an update to a risk assessment is required;
- Set up a process to provide regular engagement and feedback within our operations;
- Conducted internal audits and monitoring all specific steps to assess and address modern slavery risks to determine if mitigation measures have been consistently actioned;
- Tracked our actions and measuring impact in relation to supplier and team engagement and level of awareness; and
- Investigated partnering with an industry group to undertake an independent review of our actions.

KEY FY22 OBJECTIVES	Update
Broaden the review to develop a greater understanding of potential exposures across all our suppliers	Conducted a review of all supplier payments were paid to in the last two years. Identified that majority of suppliers are project related. The suppliers with continuous payments have been separated out to be monitored and assessed.
Continue to assess the potential modern slavery risks in our operations and supply chains with emphasis on high-risk geographical locations and business transactions	Identified that the majority of suppliers are based in Australia. When a supplier has presence in other countries, a country risk assessment will be conducted to ensure the modern slavery risks are low. Resources like Global Slavery Index are used for this exercise.
Review all company policies and identify those that may be impacted by modern slavery considerations	Review completed with our annual policy review in June 2022.
Develop training for team in understanding and recognising modern slavery risks	Preparation commenced for a training programme to commence from January 2022.
Expand screening program and conduct further due diligence on suppliers	The tender process for services (cleaning and security) conducted in end Nov 2021 requested all suppliers to complete a modern slavery questionnaire. This questionnaire has been reviewed as part of submissions, with high risk suppliers being excluded from shortlist.
Review all key service supplier contracts to ensure they contain terms that are consistent with the Act	The current supplier contracts have been reviewed to ensure that they are consistent with the Act.

KEY FY22 MONITORING	Update
Establishing a process to regularly review the actions we take by establishing an annual leadership management review of our response to modern slavery	Key to the review and enhancement of our Sustainability Program was the establishment of the ESG committee which is comprised of the CEO and senior executives and it is their role to oversee our continued response to modern slavery.
Regularly checking our risk assessment processes to ensure they remain up-to-date and that there are triggers to identify when an update to a risk assessment is required	Annual reviews have been scheduled following the annual contract renewal process.
Setting up a process to provide regular engagement and feedback within our operations	Regular reviews with the operations team are conducted on supplier performance where any risks with modern slavery are discussed.
Conducting internal audits and monitoring all specific steps to assess and address modern slavery risks to determine if mitigation measures have been consistently actioned	Supplier hours and scope are reviewed annually to ensure that Aventus requirements do not lead to modern slavery infringements. Any mitigation measures for Modern Slavery are tracking in the risk register until resolved.
Tracking our actions and measuring impact in relation to supplier and team engagement and level of awareness	Modern Slavery is used as a criteria for measuring supplier performance and it is made clear to the suppliers and the team that there are no tolerances for infringements. All suppliers are provided with the modern slavery statement and code of conduct.
Investigate partnering with an industry group to undertake an independent review of our actions.	Aventus has engaged Cleaning Accountability Framework (CAF) to conduct an pilot audit on cleaning operations. This will be rolled out across the portfolio in the future.