
Centuria

Centuria Capital Group

Modern Slavery
Statement FY25





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Acknowledgement of Country

Our group manages property throughout Australia and New Zealand. Centuria pays its respects to the traditional owners of the land in each country, to their unique cultures and to their elders past and present.

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Introduction

Letter from the CEOs

Even in a country such as Australia, with a strong government response and comprehensive legal framework, modern slavery remains an issue that requires our collective energy to address. This is particularly true for businesses with supply chains that extend beyond our shores. In 2025, an estimated 49.6 million¹ people are affected by modern slavery worldwide.

As a business that engages workers both directly as employees and globally via complex supply chains, we continued to strengthen our modern slavery approach in FY25. Our actions taken in this reporting period are outlined in this Statement.

A key focus for Centuria this year was to bring greater focus and strategy to our procurement process, which has previously been decentralised. Beyond unlocking value, our aim is to leverage our size and scale to build influential partnerships with suppliers – with expectations that their commitment to modern slavery aligns with our own. FY25 saw this transition start to come into effect, with a new procurement strategy developed. Systems and processes continued to help us deepen our understanding of where modern slavery risk may present, with Informed 365 used to screen suppliers, Rapid Global rolled out as a vendor management tool, and our Supplier Code of Conduct revised to enable further improvement.

Within our direct workforce, we continue to extend fair work conditions to our employees across all locations via a suite of policies and governance mechanisms that aim to reduce modern slavery risk. We also recognise that modern slavery is an issue that cannot be dealt with in isolation: it demands awareness and action from every member of our team. For this reason, in FY25, we launched a new online training module dedicated to modern slavery, which is mandatory for all Centuria employees. Building capability remains essential to tackling such a widespread and growing problem, and we are committed to continuing to engage our people to play their part in doing so.



John McBain
Joint CEO



Jason Huljich
Joint CEO

1. Walk Free Global Slavery Index.



About this Statement

This is the sixth Modern Slavery Statement prepared for Centuria Capital Group (Centuria, CNI or Group), and it covers the financial year ending 30 June 2025 (FY25). This Statement addresses Centuria's Australia and New Zealand operations, pursuant to Section 16 of the *Modern Slavery Act (2018)*, and contains mandatory disclosures for all relevant Centuria entities including A-REITs – Centuria Industrial REIT (ASX:CIP) and Centuria Office REIT (ASX:COF). Further detail on Centuria's structure can be found in **About Centuria**.

Mandatory criteria

Mandatory disclosures in accordance with Section 16 of the *Australian Modern Slavery Act (2018)* are outlined on the following pages.

Criteria	Page
 a. Identify the reporting entity.	6
 b. Describe the reporting entity's structure, operations and supply chains.	8-15
 c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	16-21
 d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	22-30
 e. Describe how the reporting entity assesses the effectiveness of these actions.	32-33
 f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	34
 g. Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	18, 30-31, 34

About Centuria

Business overview

Centuria Capital Group (ASX:CNI) is a leading Australasian fund manager with \$20.6 billion¹ of assets under management. We manage a range of investment products, including listed and unlisted real estate funds, and our capabilities encompass funds management, property management, property development, real estate finance, AI-enabled technology products and investment bonds.

In FY25, listed real estate investment trusts (REITs) made up approximately 29% of the Group's assets under management. Approximately 67% of Centuria's assets under management were unlisted real estate funds. Centuria's real estate finance division is provided under Centuria Bass Credit (80% owned by Centuria Capital Group). Centuria also holds a 50% interest in ResetData, a next-generation cloud services and AI provider.

Centuria currently operates across Australia, New Zealand and the Philippines. Further detail on our business can be found in our **FY25 Annual Report**.

Our purpose

We seek to transform real estate opportunities into compelling investments, which can create sustainable long-term value for our investors and bring benefits to the communities in which we operate.

Our operations and structure

Centuria comprises several entities, outlined below. Our activities take place in major cities and regional areas across Australia and New Zealand.

Group AUM¹							\$20.6 bn
Real estate²					\$19.7 bn	Centuria Life	
Listed (30%)³			Unlisted (70%)³				Investment Bonds \$0.9 bn
\$3.9 bn	\$2.0 bn	\$0.1 bn	\$5.9 bn	\$3.0 bn	\$2.5 bn	\$2.3 bn	CENTURIA LIFE GUARDIAN FRIENDLY SOCIETY
CENTURIA INDUSTRIAL REIT ASX:CIP	CENTURIA OFFICE REIT ASX:COF	ASSET PLUS LIMITED NZX:APL	SINGLE ASSET FUNDS	MULTI-ASSET CLOSED END FUNDS	MULTI-ASSET OPEN END FUNDS	REAL ESTATE FINANCE	100K+ TOTAL INVESTORS
\$6.3 bn	\$6.0 bn	\$2.3 bn	\$1.8 bn	\$1.4 bn	\$1.1 bn	\$0.7 bn	
INDUSTRIAL	OFFICE	REAL ESTATE FINANCE	LARGE FORMAT RETAIL	HEALTHCARE	DAILY NEEDS RETAIL	AGRICULTURE	
ResetData							
Sovereign AI tech							1.1MW⁴

Note: Assets under management (AUM) as at 30 June 2025. All figures above are in Australian dollars (currency exchange ratio of AU\$1.000:NZ\$1.0768 as at 30 June 2025).

Numbers presented may not add up precisely to the totals provided due to rounding.

- AUM includes assets exchanged to be settled, cash and other assets and the impact of revaluations during this period.
- Platform AUM total of \$19.7bn includes Other AUM of \$0.1bn.
- Percentage of total real estate AUM.
- Australia's first sovereign, public Artificial Intelligence Factory 'AI-F1' 1.1MW IT load (capacity).

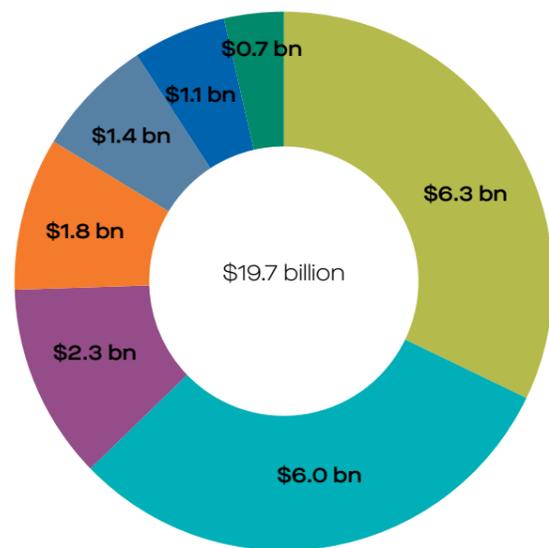
1. As at June 2025.



Australasian real estate platform¹

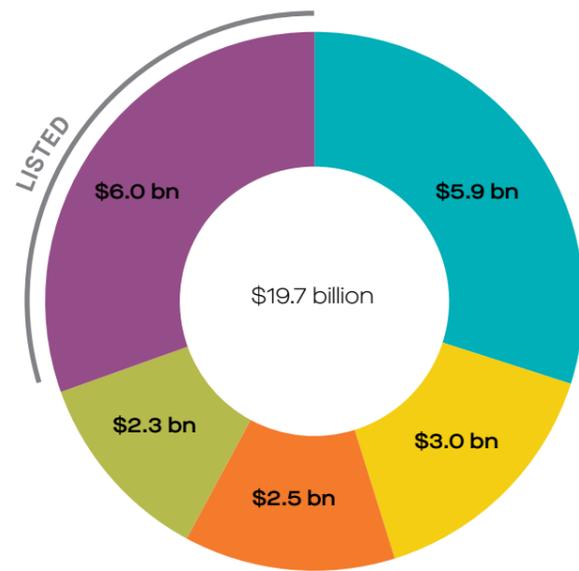
Diverse sectors and capital sources unlock emerging opportunities.

Sectors²



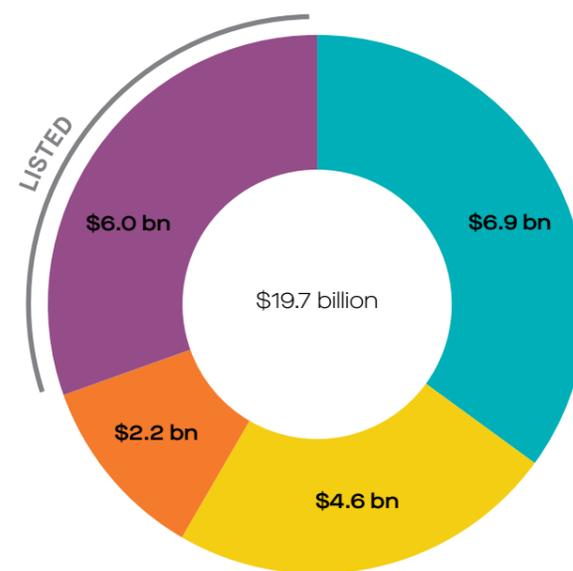
- Industrial
- Office
- Real estate finance
- Large format retail
- Healthcare
- Daily needs format retail
- Agriculture

Funds



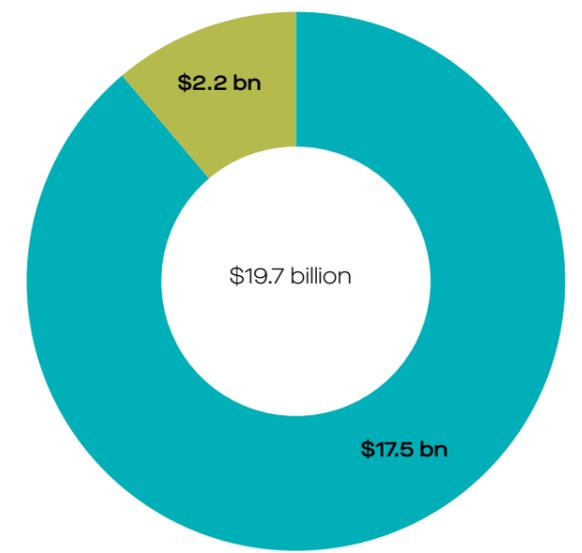
- Single asset closed ended funds
- Multi-asset closed ended funds
- Multi-asset open ended funds
- Real estate finance
- REITs

Capital



- Wholesale
- Retail
- Institutional
- REITs

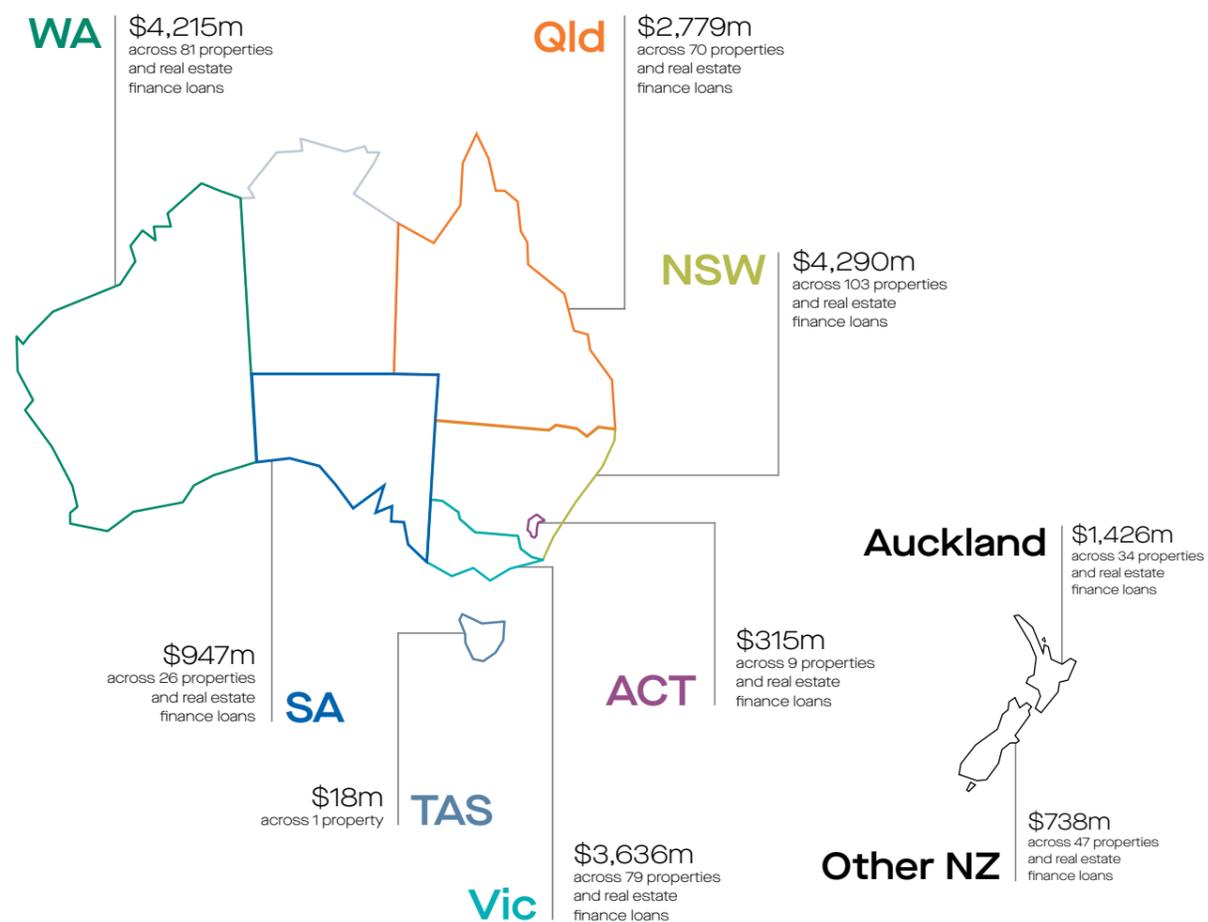
Geography



- Australia
- New Zealand

1. Assets under management (AUM) as at 30 June 2025. All figures above are in Australian dollars (currency exchange ratio of AU\$1,000:NZ\$1.0768 as at 30 June 2025). Numbers presented may not add up precisely to the totals provided due to rounding.
 2. Platform AUM total of \$19.7bn includes Other AUM of \$0.1bn.
 3. AUM includes assets exchanged to be settled, cash and other assets and the impact of revaluations during the period.

Centuria's \$19.7 billion diversified Australasian real estate platform^{1,2}



Assets under management (AUM) as at 30 June 2025. All figures above are in Australian dollars (currency exchange ratio of AU\$1,000:NZ\$1.0768 as at 30 June 2025). Numbers presented may not add up precisely to the totals provided due to rounding.

- 1. Includes asset exchanged to be settled and real estate finance loans by property.
- 2. Geographic sub totals exclude cash and other assets.



LISTED: NISHI, 2 PHILLIP LAW STREET, CANBERRA ACT

Property Services

Centuria Property Services (CPS) is Centuria’s in-house asset management team, which oversees daily operations across our diverse range of real estate funds. CPS is responsible for property valuations, leasing and facility management across assets owned by CIP, COF and Centuria’s unlisted property funds in each Australian state. These funds encompass a diverse range of sectors, including industrial, office, large format retail, daily needs retail, healthcare and agriculture. The Centuria assets that CPS does not manage directly are our Australian daily needs retail assets, which are managed by Colliers and Cygnet West, and our New Zealand assets, which are managed by Bayleys Property Services.

Development

Centuria’s in-house development team develops, redevelops and refurbishes properties on behalf of Centuria’s listed and unlisted funds and, at times, Centuria’s tenants. The team is split across the eastern and western coasts of Australia, with another team in NZ, and they work across a number of development types including offices, industrial facilities, retail centres and healthcare properties.

Friendly Society

With approximately \$0.9 billion of assets under management in FY25¹, Centuria’s Friendly Society issues and manages a range of unitised investment bonds through its Centuria Life and Centuria LifeGoals businesses. This is in addition to prepaid funeral plans issued by the Over Fifty Guardian Friendly Society.

Corporate operations

Centuria’s workforce is 379 employees (as at 30 June 2025) and is based across offices in Australia and New Zealand comprising finance, treasury, governance, risk and compliance, support services, distribution, transactions, marketing and funds management.

We also have 116 contracted personnel in Manila, who are responsible for functions such as finance, accounts payable and property services. These personnel are employed through a third-party provider, which is also responsible for leasing office space to accommodate their needs. Centuria’s Australian and New Zealand managers are responsible for their day-to-day activities.

At Centuria, managers take an active role in the welfare and development of employees within their teams. The Board has ultimate oversight of the management of employee engagement, development and wellbeing. Detailed information on our corporate governance can be found in our FY25 Annual Report.

Our supply chain

Centuria’s divisions engage a range of different suppliers, according to the nature of their business operations and needs, outlined below.

Division	Supplier categories
Real estate platform (engaged via CPS)	Property services suppliers and contractors including suppliers in high-risk industries from a modern slavery perspective, including cleaning, security and concierge, labour for building services and landscaping suppliers.
Development	Architectural, quantity surveying, legal and planning professional services, third party specialist building/construction contractors.
Friendly Society	Actuarial services firms, ratings agencies, investment managers and advisers, research houses and trading or broking services.
Corporate	Services related to finance and treasury, information technology, registry operations, legal and risk, tax, human resources, operations, marketing, communications, sustainability, investor relations, office administration, travel and insurance.



WARRAGUL, VIC

¹ As at 30 June 2025

Identifying modern slavery risk

Centuria is working to improve our understanding of how modern slavery can present in our operations and our supply chain – because the more we know, the more capable we become at identifying and addressing risks in a timely and effective way.

Assessing operational risk

In Australia and New Zealand, where Centuria has 379 employees, the inherent risk of modern slavery in our corporate operations is relatively low, as both countries have strong employment and work health and safety legislation. The risk of modern slavery is higher in the Philippines, where our 116 offshore contracted personnel are based. How we manage modern slavery risk in our operations across all locations is detailed in the next section of this Statement.

Assessing supply chain risk

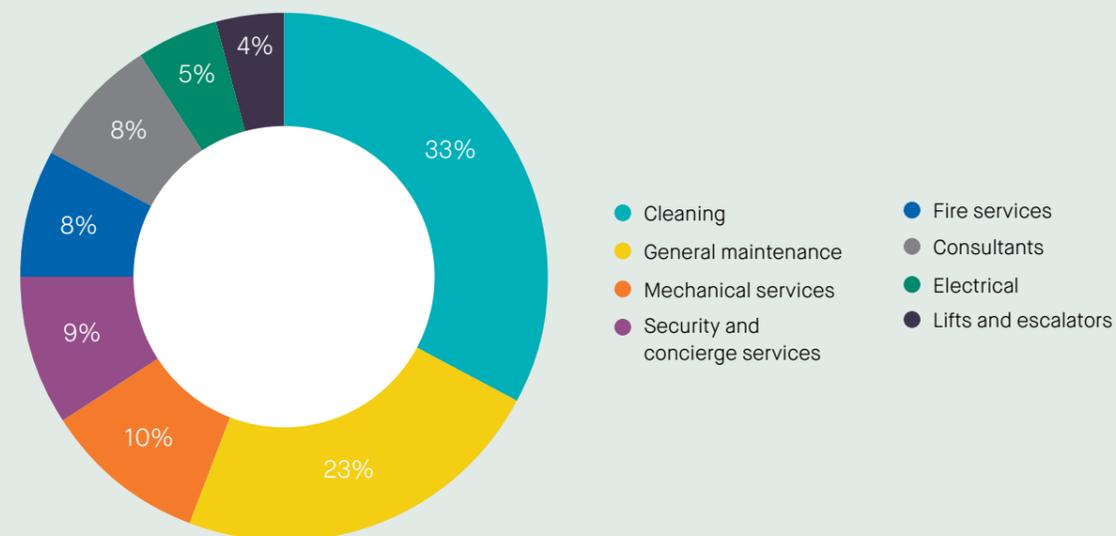
In the past, each of Centuria’s business divisions has had control of its own spend and vendor management – however, this year, we have started to shift to a more centralised approach (see the procurement case study on page 18).

Throughout FY25, Informed 365 was used to assess suppliers, either upon contract renewal or for new contracts. Contract vendor management is the responsibility of CPS. The Informed 365 assessment is based on several criteria (outlined in 'Supplier-level information' on page 17), one of its purposes being the identification of suppliers that carry a higher potential risk of modern slavery.

Supplier type

Centuria recognises that certain supplier types have a higher risk of modern slavery due to the sector they fall within or the type of goods and services they provide. Services that rely on low-skilled labour and a migrant workforce can carry an increased risk of modern slavery – and at Centuria, the services that fall into this category are primarily those provided by CPS, such as cleaning, security and concierge, labour for building services and landscaping.

Supplier type for CPS’s annual supplier spend, which includes suppliers in high-risk industries:



Spend

At Centuria, suppliers are assessed annually to determine which are 'material' – with annual spend being the determining factor. The reasoning for this is that higher spend is more likely to be with larger scale suppliers, with complex operations and supply chains where modern slavery may be present. Material suppliers are expected to have procedures to assess their own operations and supply chains for modern slavery risk and to have appropriate governance and reporting processes in place.

Supplier-level information

Through Informed 365, Centuria gathers additional information about suppliers related to supply chain visibility, geographical location, levels of engagement, worker dialogue and education, employee visa status, training and development.

In FY25, Centuria’s suppliers that completed the Informed 365 survey had results indicating approximately 74% are based within Australia. A proportion of suppliers engaged by our Friendly Society and corporate divisions were not assessed for modern slavery risk, given these suppliers are low risk for modern slavery.

A strategic shift in procurement

During FY25, Centuria reviewed our procurement strategy and identified the potential to become more systematic and efficient in our approach to vendor and contract management. We bolstered our internal capacity with the appointment of a new General Manager Procurement, and we developed a new procurement strategy in alignment with Centuria's Sustainability Framework, which guides our ESG strategic initiatives and approach. The new strategy involves close collaboration between procurement and operations teams to uplift procurement maturity at Centuria, with ESG integrated as a consideration throughout the process.

One objective of the strategy is to consolidate our spend, focusing on working with suppliers that have the scale and capabilities to service Centuria's needs across multiple locations or categories. By leveraging our size and spend, we are aiming to maximise the value of each contract and gain a more detailed understanding of the suppliers we engage – including their modern slavery approach. We have begun to standardise, systemise and further digitise our systems. Our General Manager of Procurement is also an important member of the Centuria Modern Slavery Working Group.

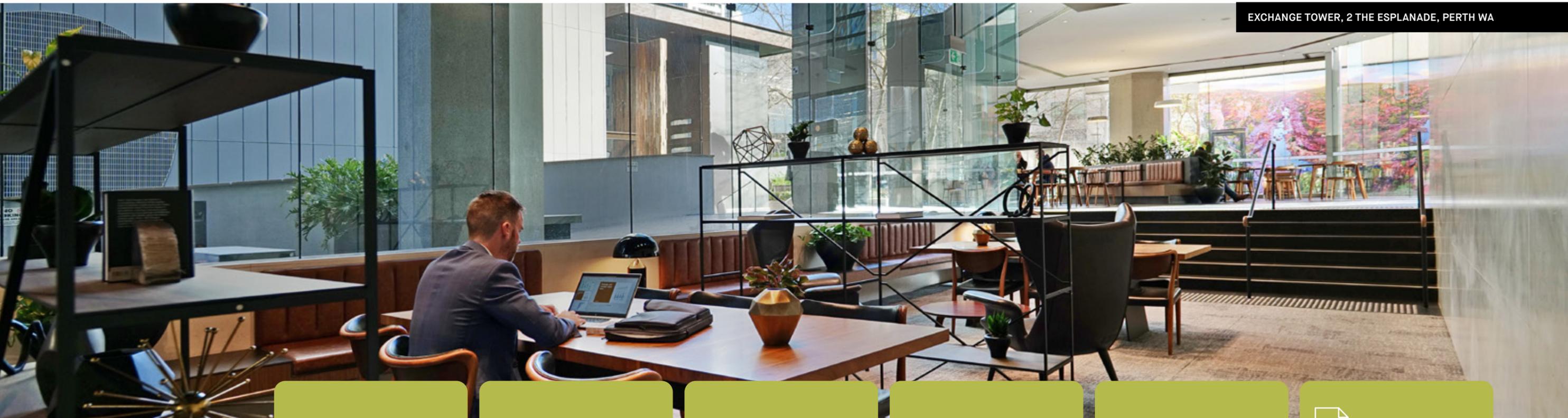
Informed 365 continues to be part of our approach to supplier engagement. This platform assists us in partnering with suppliers that have modern slavery statements in place, particularly in high-risk categories.



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Modern slavery risk areas identified in FY25

Based on the findings of our FY25 assessment, Centuria identified a number of potential modern slavery risks in our operations and supply chain, for the reasons outlined below.



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Supplier type



Material suppliers



Suppliers in high-risk industries



Small to medium suppliers



Third party property managers



Development – principal contractors



Offshore finance, accounting and property services function

Reason for potential higher modern slavery risk

Centuria's largest suppliers based on annual contract value (spend). Due to scale of operations, they are more likely to have complex supply chains with limited visibility.

Many of Centuria's cleaning, landscaping, security and concierge, and building maintenance suppliers fall within this category, with an increased level of modern slavery risk.

Centuria engages a large number of small to medium suppliers. Due to the large number of these suppliers, detailed engagement with each is challenging. Additionally, many lack the resources to effectively address modern slavery within their operations.

Third party property managers who oversee material operations for the Group present risks as they engage small to medium suppliers and suppliers in high-risk industries including cleaning, security and concierge, labour for building services and landscaping.

Principal contractors present similar risks as our third party property managers through their engagement of small to medium suppliers and suppliers in high-risk categories.

Finance, accounts payable and property services contracted personnel offshored in the Philippines present a geographic risk.

Modern slavery risks identified

- Subcontracting of services to low-skill, temporary and migrant labour increasing risk of forced labour.
- Lack of transparency from our suppliers related to modern slavery controls and their effectiveness.
- Lack of modern slavery legislation in New Zealand (specific to third party property management in NZ, Bayleys Property Services).
- Inadequate governance and grievance processes in place for our suppliers.
- Inadequate education and awareness for our suppliers to identify modern slavery risks.
- Increased risk of modern slavery based on geographic location.

Addressing modern slavery risk

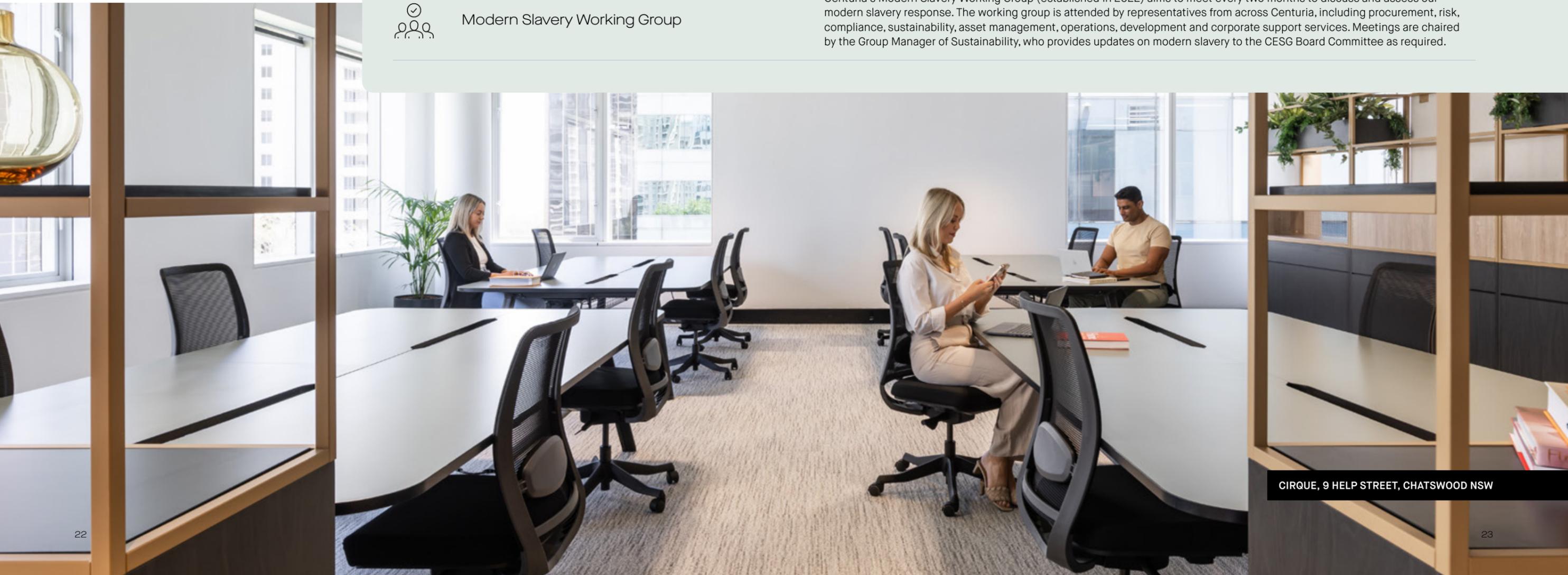
Within our operations

Centuria continued working to reduce the risk of modern slavery within our workforce and operations in FY25 through a combination of governance mechanisms and initiatives.

Governance

The governing bodies who oversee modern slavery and their roles and responsibilities are outlined in the following table:

Governing body	Role and responsibilities regarding modern slavery
 Centuria Capital Group and Responsible Entity Boards	Centuria Capital's Board of Directors oversees the Group's approach to modern slavery. Additionally, COF and CIP's responsible entity boards (Centuria Property Funds Limited (CPFL) and Centuria Property Funds No. 2 Limited (CPF2L), respectively) oversee modern slavery risk for operations within their respective REITs. The CNI, CPFL and CPF2L Boards approve this Statement, which includes disclosures for COF and CIP under Section 16 of the <i>Australian Modern Slavery Act (2018)</i> .
 Audit, Risk and Compliance Committees (ARCC)	Material risks for each entity are overseen by the respective ARCC. A material risk is any risk that could have a material impact, both financially and non-financially, on Centuria or on the interests of its investors. Each quarter, any material risks are reported to the relevant ARCC (CNI, CPFL and CPF2L). During the reporting period, modern slavery was not identified as a material risk for Centuria, its subsidiaries or its investors.
 Culture & ESG (CESG) Board Committee	The CESG board committee is composed of non-executive and executive directors, is accountable to the Centuria Capital Board and works primarily in an advisory capacity. The CESG board committee has reviewed this Statement and recommended its approval by the relevant Boards.
 Modern Slavery Working Group	Centuria's Modern Slavery Working Group (established in 2022) aims to meet every two months to discuss and assess our modern slavery response. The working group is attended by representatives from across Centuria, including procurement, risk, compliance, sustainability, asset management, operations, development and corporate support services. Meetings are chaired by the Group Manager of Sustainability, who provides updates on modern slavery to the CESG Board Committee as required.





Centuria also has a policy framework to support effective governance regarding modern slavery, and a consistent approach to assessing, addressing and monitoring risks across the Group. Relevant policies include:

- Group ESG Policy, last reviewed and updated in FY26
- Code of Conduct (mandatory for all employees)
- Supplier Code of Conduct (see page 30)
- Whistleblower Policy
- Fraud and Corruption Control Policy
- Work health and safety procedures
- Risk Management Framework

Training

Improving our employees' knowledge and capability regarding modern slavery has been a key focus for Centuria in FY25. Having identified opportunities to raise awareness across our workforce, we rolled out a new online modern slavery training module, which is mandatory for all staff. The module content aims to help participants gain a general understanding of modern slavery, recognise potential concerns, and understand the appropriate steps to take if an issue is identified. It also outlines compliance and reporting obligations under the relevant legislation.

Monitoring

As in previous years, Centuria has monitored payment on time in FY25, aiming to minimise the risk of suppliers paying contractors and subcontractors late. The payment times of supplier invoices are monitored during monthly finance meetings, with updates provided to the Modern Slavery Working Group. Centuria aims to consistently pay all suppliers on time and will continue to monitor performance and address any issues as they arise.

Whistleblower Policy

The Centuria Whistleblower Policy outlines an internal approach available for reporting cases of modern slavery on an anonymous basis. In addition, all employees have a Key Performance Indicator (KPI) as part of their performance appraisal process that requires compliance with these policies and procedures applicable to their role and duties.



Within our supply chain

In FY25, Centuria continued to take actions aimed at reducing modern slavery risk, prioritising suppliers with an increased risk, including those engaged through CPS and as third-party property managers. Key activities completed in the reporting period have been outlined below.

Supplier type _____ **Action** _____

Material suppliers

In FY25, CPS's material suppliers were in industries including cleaning, landscaping, security and concierge, and building maintenance. To renew a contract, or enter into a new one, these suppliers must enter into a Building Services Agreement (BSA). This agreement includes the completion of screening via Informed 365, which provides Centuria with an insight into the supplier's modern slavery approach, including whether they have a modern slavery statement in place. Centuria expects these suppliers to have the necessary systems in place to assist with monitoring and managing modern slavery risks within their supply chain – expectations which are communicated with suppliers throughout the onboarding contracting process.

Suppliers in high-risk industries

Compliance with the BSA is reviewed at operational level meetings. These meetings have whistleblowing as an agenda item – helping to keep the identification of potential modern slavery risks top of mind. Targeted action has also been taken to assist induction of new cleaning contracts across our assets (see cleaning case study on page 31). In addition, these suppliers are required to adhere to Centuria's Supplier Code of Conduct, which is provided as part of engagement. This contains specific requirements related to modern slavery and was recently reviewed as part of Centuria's risk mitigation (see page 30).

Small to medium suppliers

New and existing small to medium suppliers are also required to enter into a BSA with Centuria upon initial engagement or contract renewal. As outlined above, this requires compliance with Centuria's Supplier Code of Conduct and the completion of the Informed 365 assessment.



Supplier type

Action



Third party property managers

Centuria employs third-party property management contractors, Bayleys Property Services, for the New Zealand portfolio, and Colliers International and Cygnet West for daily needs retail assets across Australia. Knight Frank manage select South Australian office, health care and industrial assets for Centuria, and Jones Lang Lasalle (JLL) manages a single office asset in Adelaide.

In FY25, Bayleys Property Services implemented a zero-tolerance approach to modern slavery and human trafficking across their operations. Where reasonable, they conduct due diligence of suppliers during the onboarding process and provide training to select Property and Facilities Managers to ensure the risks of modern slavery are known and are mitigated to an appropriate level.

Colliers International has zero tolerance to modern slavery issues, as outlined in its Modern Slavery Policy, which sets out the standard applicable to all its suppliers. Colliers International uses its Supplier Code of Conduct and questions relating to modern slavery as part of its supplier due diligence process, and it encourages reporting of any issues or suspected breaches of its policy.

Knight Frank has a comprehensive Anti-Slavery policy that outlines commitments to maintaining a zero-tolerance approach, undertaking due diligence and stakeholder engagement, enforcing a relevant policy framework and embedding modern slavery requirements into their procurement process. Compliance with this policy, together with Knight Frank's Supplier Code of Conduct, is mandatory for all suppliers. In addition, Knight Frank has a detailed Modern Slavery Remediation Plan, to be initiated when a disclosure regarding modern slavery is raised in accordance with the Knight Frank Australia Whistleblower Policy.

Cygnet West has a Modern Slavery Policy in place to help ensure its suppliers are compliant with their modern slavery expectations. In addition, they have implemented a process to support awareness and compliance with the policy (see case study on page 30)

JLL has a Human Rights Policy that sets out their commitment to promoting workers' rights and fair labour practices and to eliminating modern slavery practices in their business and supply chains. Across its Australian operations, JLL enforces this policy alongside its Vendor Code of Conduct, which outlines clear expectations for ethical behaviour, prohibits forced labour, and requires suppliers to comply with modern slavery laws. These obligations are embedded in supplier contracts and supported by regular supply chain reviews to identify high-risk areas – particularly in sectors like construction, cleaning, and security services, and in goods such as personal protective equipment and electronics. JLL also works closely with suppliers by providing modern slavery training and requiring higher standards.

Supplier type

Action



Development – principal contractors

As part of the pre-qualification process, principal contractors on Centuria's development projects are expected to have modern slavery policies in place, to complete the Informed 365 assessment and to comply with Centuria's checklist, which incorporates the Supplier Code of Conduct.

As part of engagement, principal contractors of Centuria's development projects are contractually required to comply with the requirements of the Modern Slavery Legislation, complete the informed 365 assessment and to comply with Centuria's checklist, which incorporates the Supplier Code of Conduct. Contractors, where reasonably practicable, are to engage subcontractors that also comply with the contract requirements. Where a contractor identifies an occurrence or risk of modern slavery occurring in its own operations, the operations of any subcontractors or suppliers it must immediately take reasonable steps to rectify and mitigate as well as notify Centuria in writing.

Centuria aims to further review the Informed 365 assessment results for its largest contracts with principal contractors. Where scores indicate an area for improvement, Centuria aims to engage with the respective contractor to assist in strengthening its approach to modern slavery.

Centuria's Supplier Code of Conduct

Since April 2023, compliance with Centuria's Supplier Code of Conduct has been a mandatory requirement for all new suppliers engaged by CPS and those renewing contracts. This Code includes minimum standards that all maintenance must comply with across a range of ESG topics, including modern slavery. Suppliers are required to confirm that they:

- Educate and make their own employees aware of modern slavery.
- Collaborate with their own suppliers to raise awareness of modern slavery.
- Do not contribute or conceal cases of modern slavery.
- Provide information pertaining to the risk management and governance approach towards modern slavery.
- Report any cases of modern slavery uncovered, either directly through their operations or their own suppliers/supply chain.

In FY25, Centuria engaged a specialist to benchmark this Code of Conduct against industry peers, and it identified areas that could be improved. This exercise was driven by our overarching transition in procurement strategy, which aims to rationalise our supplier base and focus on tendering at a national level, rather than on an asset-by-asset basis. As a result of this initiative, the newly refreshed Code of Conduct (expected to be launched in FY26) will better cater to suppliers operating across different locations and asset classes.

Case study: Cygnet West

Cygnet West takes a proactive approach to modern slavery in recognition of key clients' responsibilities in this area. Although the *Modern Slavery Act (2018)* does not apply to Cygnet West as it is not a reporting entity under the legislation, in FY24, Cygnet West voluntarily developed and rolled out a Modern Slavery Policy, integrating it into both MyBuildings and their Preferred Contractor systems.

Cygnet West built on this work by establishing a process to ensure that all preferred contractors engaged on managed properties have access to the policy and acknowledge it during the registration stage. As part of the registration process through Cygnet West's Work Request System (WRS), contractors are required to read the Modern Slavery Policy, confirm that they have read and will comply with it, indicate whether they have their own Modern Slavery Policy and upload a copy to the portal. This process has been formalised within Cygnet West's ProMapp online workflow.

Case study: simplifying processes for cleaning contractors

Cleaners engaged by CPS have been identified as having a high risk of modern slavery, largely due to the sector's reliance on low-skill, temporary and migrant labour. In FY25, one action taken by Centuria to reduce this risk was to continue to improve the induction and sign-in process currently in place for cleaning staff across Centuria properties.

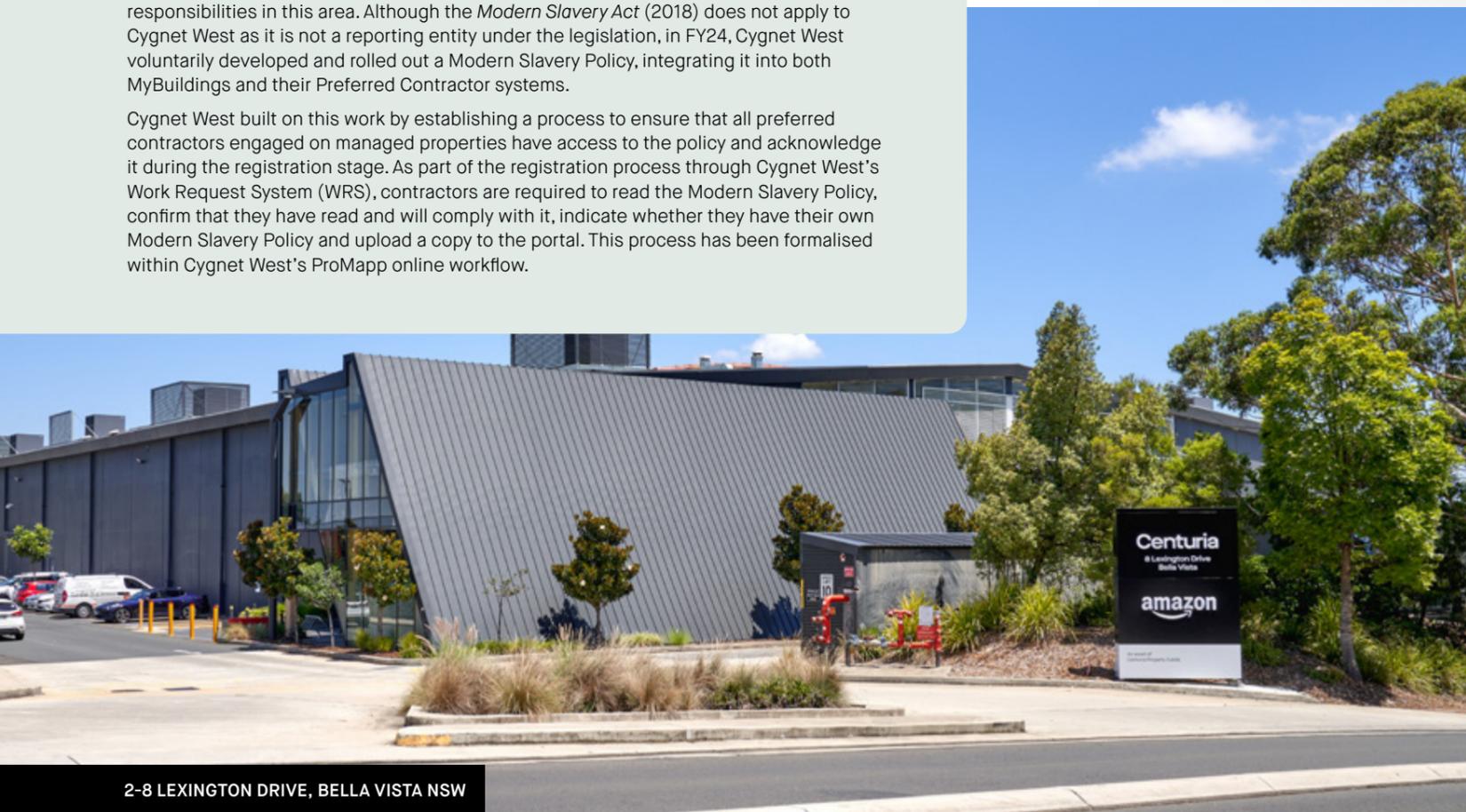
Centuria utilises the Rapid Global platform across our operating assets in Australia: a vendor management system that helps ensure that mandatory induction training, including modern slavery training, has been completed by all contractors at our sites. Rapid Global also enables monitoring and reporting to identify risks and place controls on pre-qualification and site conformance requirements including Work Health and Safety, site induction and risk management.

Last year, Centuria integrated Rapid Global into CPS's existing MyBuildings work order management system – and throughout FY25, we rolled out the platform for all cleaners and contractors on-site.

Now, 100% of cleaning contractors have been onboarded to Rapid Global. English is not necessarily the first language for cleaning staff – so we also developed a specific check-in process for cleaners, with simplified language used to overcome potential language barriers.

The check-in process is designed to capture information about hours worked by cleaning providers across all contracted buildings, health and safety concerns and more. We run monthly checks on vendors' compliance with Centuria's supplier code of conduct, modern slavery obligations and payment terms – and we ask building managers to flag any non-compliance issues via email.

This approach is an improvement from our previous asset-by-asset approach to assessment, and it is continuing to help Centuria understand the services provided across our real-estate platform so we can better address the modern slavery risks involved.



2-8 LEXINGTON DRIVE, BELLA VISTA NSW



1 INTERNATIONAL DRIVE, WESTMEADOWS VIC

Measuring our effectiveness

RIVERLEA PARK, SALISBURY SA

Metrics and performance

Managing modern slavery risks, actions and the effectiveness of the actions across the Group's operations remains a focus for Centuria. Each of these elements is reported to the CNI, CIP and COF Boards as part of this Statement's approval. A summary of the effectiveness of our supplier and corporate actions is below.

Action	Measure of effectiveness	FY25 performance
Reduce risk of modern slavery in Centuria's suppliers' operations through awareness and mandatory compliance with modern slavery requirements in supplier contracts.	<p>An annual analysis of expenditure is completed to gain an understanding of suppliers that are material (based on spend data) and that operate in high-risk industries across our real estate platform by supplier type and services.</p> <p>This is combined with the Informed 365 assessment results to form a better understanding of our supply chain and potential modern slavery exposure.</p>	<ul style="list-style-type: none"> Annual assessment of supplier expenditure completed with Centuria's supply chain identified and categorised into supplier types. Transitioned 100% of cleaning staff at Australian operating assets to Rapid Global – improving transparency on all contractors visiting Centuria assets/sites and enhancing accountability for suppliers to improve modern slavery awareness for their employees. Approximately 60% of suppliers monitored through the Rapid Global platform provided a formal statement or commitment related to minimising the risk of modern slavery within their operations. All new or renewed BSAs managed by CPS require suppliers to be screened by Informed 365 and to comply with the Supplier Code of Conduct, which was benchmarked in FY25 and is under review. Centuria's Australian third-party property managers, Colliers and Cygnet West, Knight Frank and JLL have modern slavery policies in place.
Governance – ensure corporate governance addresses modern slavery risks.	<p>Ensure Centuria's operating policies help to assist our staff and suppliers with assessing modern slavery in our supply chain.</p>	<ul style="list-style-type: none"> Supplier Code of Conduct, Whistleblower Policy and ESG Policy in place. Modern Slavery Working Group, which now includes the General Manager of Procurement, aims to meet each two months to track Centuria's response to modern slavery. Supplier Code of Conduct and BSA for suppliers engaged by CPS requires suppliers to assist Centuria with its monitoring of modern slavery risk. The BSA has been implemented for new or renewal supplier contracts throughout the reporting period, which requires suppliers to comply with modern slavery and the updated Supplier Code of Conduct requirements.
Monitoring – payment on time	<p>Monitor timeliness of supplier payments to ensure Centuria reduces the risk of delayed payments to suppliers' contractors or subcontractors.</p>	<p>The Property Accounts Payable report assesses payment vs invoice dates each month to monitor performance. Standard payment terms are 30 days from invoice submission, with Centuria's average payment time during FY25 at 32 days.</p>

Action	Measure of effectiveness	FY25 performance
Training – employees	<p>Ensure employees who are involved in monitoring and managing modern slavery for the Group and supplier-facing roles receive training on modern slavery.</p>	<p>In FY25, a new online modern slavery training module was made mandatory for all Centuria staff and was rolled out via our internal training and compliance platform, Acorn. The training was also issued to all staff in New Zealand.</p>
Supply chain management – initial screening	<p>We expect new suppliers engaged through CPS and principal contractors engaged by development to be screened by the Informed 365 System.</p>	<p>All new suppliers or suppliers with contract renewals with CPS are sent an Informed 365 assessment as part of the new Centuria BSA.</p> <p>Principal contractors of Centuria's development projects are contractually required to comply with the requirements of the Modern Slavery Legislation, complete the informed 365 assessment and to comply with Centuria's checklist, which incorporates the Supplier Code of Conduct. Contractors, where reasonably practicable, are to engage subcontractors that also comply with the contract requirements.</p>
Supply chain management – engagement	<p>Engaged with suppliers identified as either material or operating in high-risk environments to ensure they have sufficient governance to mitigate modern slavery risks, including a Modern Slavery Statement.</p>	<p>Centuria periodically engaged with CPS's material cleaning contractors throughout the reporting period. CPS intends to maintain ongoing collaboration with these suppliers to stay informed of their monitoring and management of modern slavery risks.</p>
Escalation pathway	<p>Ensure awareness of an appropriate reporting escalation pathway.</p>	<ul style="list-style-type: none"> Supplier Code of Conduct, Whistleblower Policy and ESG Policy in place. Employee awareness training on the Whistleblower Policy is included in staff compliance training. All employees have a specific KPI requiring compliance with any policies and procedures applicable to their role and duties.
Reporting	<p>Modern slavery reporting is provided to Centuria's governing bodies.</p>	<p>Updates on modern slavery were made in the reporting period to the relevant committees including the ESG Management Committee and the Culture and ESG Board Committee.</p> <p>Each quarter, any material modern slavery risks are reported to the ARCC of each Board (CNI, CPFL and CPF2L). No material modern slavery risks were reported in FY25.</p> <p>The CNI, CPFL and CPF2L Boards approved this Statement following a review by the CESC Board Committee and its recommendation for approval.</p>

Next steps

Identifying and addressing modern slavery remains an important challenge for Centuria, particularly with regard to our complex supply chain and contracted workforce. Moving to a group led and strategic procurement approach has been an important transition that Centuria has embarked on this year, coupled with ongoing refinement of processes and strengthening of policies and procedures. The importance of awareness and education can not be underestimated, and we are invested in continuing to build modern slavery awareness across our business to harness our collective ability to combat this issue. We look forward to keeping you updated with our progress in future.

Group consultation and reporting entities

Centuria undertakes an annual review of its revenue to identify areas of the business that should be consulted in drafting the Statement. Entities that have consolidated revenue of \$100 million or more are specifically engaged. Management and each entity's governing body are required to approve this Statement. Details of all entities consulted as part of the development of this Statement and their respective approval date of this Statement are summarised below.

This Statement is made by the following reporting entities:

- Centuria Capital Group (ASX:CNI) 'Centuria' or 'the Group'.
- Centuria Office REIT (ASX:COF) responsible entity is Centuria Property Funds Limited ARSN 124 364 718 | ABN 11 086 553 639 | AFSL 231149.
- Centuria Industrial REIT (ASX:CIP) responsible entity is Centuria Property Funds No.2 Limited ARSN 099 680 252 | ABN 38 133 363 185 | AFSL 340304.

Whilst this Statement has been prepared specifically for the above-named entities, the principles and procedures have been applied across the Group.



Anna Kovarik
Company Secretary

Disclaimer

This Report contains statements that are, or may be deemed to be, forward looking statements. Forward looking statements can generally be identified by the use of forward-looking words such as 'anticipates', 'estimates', 'will', 'should', 'could', 'may', 'expects', 'plans', 'forecasts', 'target' or similar expressions. The nature of forward looking statements require us to make assumptions that are subject to inherent risks and uncertainties, many of which are beyond our control and give rise to the possibility that our predictions, expectations or conclusions will not prove to be accurate, that our assumptions may not be correct. These forward-looking statements are provided as a general guide only and should not be relied upon as an indication or guarantee of future performance. No independent third party has reviewed the reasonableness of any such statements or assumptions.

To the maximum extent permitted by law, Centuria does not accept any liability (including, without limitation, any liability arising from fault or negligence) for any loss whatsoever arising from the use of this report or its contents or otherwise arising in connection with it.



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