

Modern slavery statement – Commercial & General Pty Ltd

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Reporting period 1 July 2022 to 30 June 2023

Modern slavery statement

Introduction

This modern slavery statement (**Statement**) has been published by Commercial & General Pty Ltd (**C&G**) pursuant to the *Modern Slavery Act 2018* (Cth) (**the Act**) in respect of the reporting period ending 30 June 2023 (**Reporting Period**) and covers C&G and its controlled entities (**C&G Group**).

C&G Group is a Reporting Entity within the meaning of the Act for the Reporting Period. This Statement is published pursuant to the requirements of the *Modern Slavery Act 2018* (Cth). C&G Group is committed to assessing, in so far as reasonably practicable, any risks of modern slavery in its operations and supply chains and taking appropriate steps to address those risks.

This is the third Reporting Period for which the C&G Group has submitted a Statement.

This Statement outlines the steps C&G Group has taken during the Reporting Period and its future plans to identify and address modern slavery risks in its operations and supply chains.

Modern slavery

C&G Group recognises that modern slavery takes many forms which are crimes and a violation of fundamental human rights involving the deprivation of a person's liberty and exploitation for personal or commercial gain. Modern slavery includes:

- human trafficking;
- recruitment with the intention of depriving a person of their personal freedoms;
- confiscation of personal or travel documents;
- forced labour;
- debt bondage;
- servitude;
- child labour; and
- any other kind of exploitation that violates a person's human rights and dignity.

Structure, operations, and supply chains of the C&G Group

The C&G Group is a vertically integrated property group that develops, constructs, manages and invests, in high quality commercial, industrial, and multi-unit residential properties in Australia. C&G Group is based in Adelaide and also has offices in Melbourne. The entities within the C&G Group are fully integrated and share common management and administration services and systems.

C&G Group undertakes in house project management and engages third party consultants to assist in managing and delivering projects.

C&G's major suppliers are:

- large scale building contractors engaged in connection with projects;
- third party building, construction and property management consultants.

All of C&G Group's projects and operations are situated in Australia.

Throughout the Reporting Period C&G Group also had interests in joint ventures which held industrial property portfolios in Australia.

Risks of modern slavery practices in the operations and supply chains of the C&G Group

The C&G Group continues to assess modern slavery risks within its operations and supply chains.

C&G Group's operations are conducted within Australia with Australian based employees. Builders and consultants with which C&G Group contracts are also based in Australia although they may be part of groups with multinational operations. We have determined that given the low prevalence and risk of modern slavery practices in the industry within Australia, these operations have a low or negligible risk of modern slavery practices.

C&G Group has identified a potential for modern slavery risks in building and construction supply chains in so far as building and construction supplies may be sourced from regions where labour and manufacturing conditions are more likely to involve modern slavery practices. C&G Group does not have visibility over these aspects of its supply chain but actively requires its contractors and suppliers, through contractual terms to adhere to, identify and mitigate modern slavery risks.

C&G Group has also identified a potential for modern slavery risks in IT and business administration supply chains in so far as some of those services have overseas offices. C&G Group does not have visibility over these aspects of its supply chain but again, actively requires these suppliers, through contractual terms, to adhere to, identify and mitigate modern slavery risks.

C&G Group continues to improve its processes for making enquiries of its major suppliers with respect to modern slavery risks and the management of those risks in these supply chains. C&G Group has personnel dedicated to monitoring its ESG (environment, social and corporate governance) obligations and compliance, which includes modern slavery. These personnel are working to consolidate and develop a reporting framework for the C&G Group relating to these matters, which is currently anticipated to be completed in 2024.

Actions taken by the C&G Group to assess and address risks of modern slavery, including due diligence and remediation processes

Supply chain due diligence

To enable C&G Group to assess the risks of modern slavery in our supply chains, C&G Group has implemented a process of making enquires with our major suppliers about risks in their supply chains and how modern slavery risks are managed by them. C&G Group is now actively looking to implement processes whereby new suppliers are queried as to their supply chains and modern slavery risks at the initial stages and prior to formal engagement of those suppliers. C&G Group believes this will bring modern slavery risks and mitigation of same to the forefront of our suppliers' minds.

The responses to these enquiries will be used to assess the nature and extent of modern slavery risks in the supply chains of our major suppliers and to assist C&G Group in identifying possible mitigation steps that can be built into C&G Group's supplier selection and contracting processes.

Modern slavery supplier code of conduct

C&G Group has a modern slavery supplier code of conduct (**Supplier Code**) which reinforces our commitment to ethical business operations and our expectations of our suppliers. Those expectations include:

- sharing our commitment to mitigating modern slavery risks in our supply chains;
- taking meaningful steps to identify and address modern slavery risks in their operations and supply chains;
- complying with any mandatory reporting obligations relating to modern slavery;
- providing the C&G Group with information about their supply chains to assist us in identifying and mitigating modern slavery risks.

C&G Group monitors compliance with the Supplier Code on an on-going basis and takes appropriate steps, to the extent practicable, to address instances of non-compliance. C&G Group is also working to integrate the Supplier Code into our supplier selection and contracting processes.

Contractual terms

C&G Group has introduced changes to its standard trading and contract terms with its suppliers to include terms designed to facilitate the identification and mitigation of risks and to eliminate modern slavery practices. These terms are incorporated across the business, with suppliers, contractors and consultants actively accepting the obligations imposed by C&G Group in respect of modern slavery mitigation, and in respect of construction contractors, C&G Group requires information from the contractor's supply chain in relation to modern slavery.

Consultation with entities owned or controlled by C&G

The C&G Group of entities operate under common management and reporting. Head office, administrative and management staff (human resources, in-house legal counsel, senior management) are responsible for the operation management of the C&G Group of entities. C&G Group entities therefore have direct lines of communication to Commercial & General Pty Ltd (who has prepared this Statement) and Commercial & General Pty Ltd has full visibility in relation to the operations of the C&G Group of entities. Commercial & General Pty Ltd has therefore been carrying out continuous consultation with the C&G Group in the development of this Statement.

There are no entities outside of the C&G Group which are controlled by Commercial & General Pty Ltd.

Other

C&G Group plans to continue to facilitate training sessions for staff to outline key principles of modern slavery and to train staff to better assess suppliers in the context of C&G Group's Supplier Code.

C&G Group also commits to meeting modern slavery standards when submitting tenders for projects.

Review of C&G Group's policies, processes and practices

C&G Group is in the process of undertaking an overall review of its policies, processes and practices and is establishing a framework and action plan for progressively integrating measures designed to address modern slavery risks across its operations.

C&G Group have, as a result, developed and implemented an internal Modern Slavery Policy applicable to all persons working for us or on our behalf, including employees, directors, officers, agents, contractors, consultants, and business partners (**Modern Slavery Policy**).

The Modern Slavery Policy identifies and sets out C&G Group's commitment to respecting human rights and addressing modern slavery, principles for taking meaningful action to identify and address modern slavery, C&G Group's compliance framework and standards of behaviour which C&G Group expects of its personnel and business partners with respect to addressing modern slavery. The Modern Slavery Policy also identifies key roles and responsibilities within C&G Group for implementing the policy.

C&G Group will review its Modern Slavery Policy in 2024 and will continue to periodically review and monitor progress against its modern slavery action plan. Examples of the measures that C&G Group is progressing as part of its action plan are outlined below.

Assessing the effectiveness of actions taken to address modern slavery risks

C&G Group's modern slavery action plan includes establishing processes for regularly reviewing and reporting on the effectiveness of the steps taken to identify and mitigate modern slavery risks including:

- monitoring supplier responses to our modern slavery risks enquiries;
- tracking supplier compliance with our Supplier Code;
- assessing the level of internal and external awareness of and commitment to eliminating modern slavery practices.

Future commitments

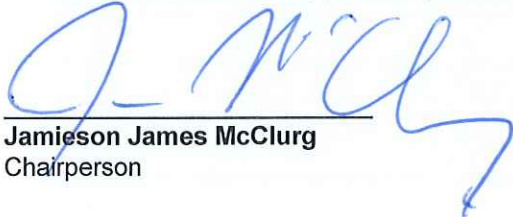
As noted above C&G Group continues to progressively integrate modern slavery risk mitigation measures across its operations under a modern slavery action plan

Future measures that C&G Group will be considering as part of its action plan will include:

- integrating modern slavery information and provisions into all relevant human resources policies;
- establishing internal processes for monitoring responses to supplier enquiries, tracking progress of implementing our modern slavery mitigation measures and assessing the effectiveness of measures already implemented;
- roll out new trading and contractual terms incorporating modern slavery clauses;
- integrating modern slavery risk assessment into the onboarding of new suppliers and ongoing assessment of existing suppliers;
- expanding the scope of supplier enquiries about modern slavery matters;
- once implemented, regular review of supplier compliance with the Supplier Code and modern slavery trading and contractual terms
- training for officers and employees to improve their knowledge of modern slavery and increase their ability to identify potential risks in our operations and supply chains.

Approval

This Statement has been approved by the board of C&G and is hereby signed by the Chair of the Board.



Jamieson James McClurg
Chairperson